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1982
PLAN
AMENDMENTS

to the
CALIFORNIA DESERT PLAN
and the
EASTERN SAN DIEGO COUNTY MFP

Final
Environmental Impact Statement

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

CALIFORNIA

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March 3 1849

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
California Desert District
1695 Spruce Street
Riverside, California 92507

IN REPLY
REFER TO:

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Dear Reader:

Enclosed for your review and comment is the Final Environmental Impact Statement for the 1982 Plan Amendments to the California Desert Plan and the Eastern San Diego County Management Framework Plan. The Final EIS has been prepared in an abbreviated format consistent with provisions of Section 1500 of 40 CFR, the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act of 1969. Text revisions or additions made in response to public suggestions are also presented. Therefore, this document should be used in conjunction with, rather than in place of, the Draft EIS.

My thanks to those of you who sent in comments and suggestions - I hope that you will continue to help us manage your public lands.

The decision to accept or to reject these proposed amendments will be based on a number of factors including effect on the natural environment, input from the public, and recommendations of the California Desert District Multiple-Use Advisory Council.

We are providing a 60-day period for public review. Final decisions will be announced shortly after the end of that period. Amendments which are accepted will be in effect at the time final decisions are published. Please be sure to return your comments to this office no later than MAY 10 1983 ; protests must be filed with the State Director in Sacramento by the same date. Send your comments to the following address:

California Desert District
Bureau of Land Management
Attn: Plan Amendments
1695 Spruce Street
Riverside, California 92507

Sincerely,

Gerald E. Hillier
District Manager

BLM CA EIS 83-005 1792

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Final Environmental Impact Statement

PROPOSED 1982 AMENDMENTS
TO THE CALIFORNIA DESERT CONSERVATION AREA PLAN
AND THE
EASTERN SAN DIEGO COUNTY MFP

Prepared by
Department of the Interior
Bureau of Land Management
California Desert District

The Bureau of Land Management is conducting its 1982 review of the California Desert Plan and the Eastern San Diego County Management Framework Plan. This Environmental Impact Statement considers the environment consequences of accepting or rejecting each of the 49 proposed amendments which have been accepted for consideration. Amendments fall into one of seven categories, including desert-wide amendments, site-specific vehicle access changes, livestock grazing adjustments, ACEC and special area designation changes, nonwilderness multiple-use class changes, changes in wilderness designation, and amendments to the Eastern San Diego Plan. Under the Bureau's preferred alternative, 28 amendments would be accepted as proposed by the proponent, 9 amendments would be accepted with modifications, and 12 would be rejected. Desert-wide, Class C acreage would change from 2,083,000 to 1,840,150, Class L would change from 5,864,000 to 6,064,540, Class M would change from 3,356,000 to 3,370,560 and Class I would change from 503,000 to 522,610.

Ed Hastey
STATE DIRECTOR
CALIFORNIA STATE OFFICE

For further information contact: Gerald E. Hillier, District Manager
California Desert District
Bureau of Land Management
1695 Spruce Street
Riverside, California 92507

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SUMMARY

PLAN AMENDMENTS

In accordance with procedures set forth in Chapter 7 of the California Desert Plan and with 43 CFR 1600 (BLM Planning Regulations), the Bureau of Land Management, California Desert District, is conducting the second amendment review of the plan.

Proposals for amendments were accepted during a three-month period from mid-February to mid-May 1982. Approximately 120 amendments were proposed by the public and by BLM staff for consideration. These amendments were screened by BLM management and the California Desert District Multiple Use Advisory Council to determine which proposals should be considered at this time and which should be deferred, dropped, or could be handled more appropriately by an administrative action. Forty-nine amendments were recommended for consideration:

Category	Number	Description
Desert-Wide	1	Allow consideration of new communications sites in Class L, subject to NEPA requirements.
	2	Revise Multiple Use Class guidelines for minerals.
	3	Revise motorized vehicle element.
	4	Change water quality guidelines wording.
Vehicle Access	5	Change Panamint Dunes from "closed" to "partially open."
	6	Establish a point-to-point race course, the Barstow-to-Vegas course, from Alvord Road to Sloan, Nevada.
	7	Change Rasor Open Area boundaries.
	8	Change designation of the following closed dry lakes: Soda, Silver, Coyote, Superior, and Harper.
Grazing	9	Change Afton Canyon Allotment from ephemeral to ephemeral/perennial.
	10	Expand Afton Canyon Allotment.

Category	Number	Description
Grazing cont.	11	Change Cronese Lake Allotment from ephemeral to ephemeral/perennial.
	12	Enlarge Granite Mountain Allotment by including Bristol Mountains.
	13	Change Kelso Dunes area from ephemeral to perennial/ephemeral.
	14	Change range suitability criteria.
ACECs/Special Areas	15	Establish new ACEC at Big and Little Sand Springs.
	16	Relocate and rename ACEC 36.
	17	Enlarge Halloran Wash ACEC.
	18	Change boundary of East Mojave Scenic Area.
Multiple Use Class Changes (Non-Wilderness)	19	Rand Mountains. Change from Class M to either Class I or Class L.
	20	Change Planning Unit (P.U.) 32 from L to M.
	21	Change P.U. 34 from L to M.
	22	Change all or portions of P.U. 38 from L to M.
	23	Change P.U. 36 from L to M.
	24	Change Round Mountain/Grapevine Canyon area from L to M.
	25	Change Red Cloud Mine area from L to M.
	26	Change Gordon's Well area of Imperial Sand Dunes from L to I.
Changes in Wilderness Designation	27	Change two square miles of WSA 117 (Saline Valley) from suitable Class M to non-suitable near Victor Cons mine.
	28	Change two square miles of WSA 150 (Nopah Range) from suitable to non-suitable Class M near Shaw mine.

Category	Number	Description
	29	Change portion of WSA 150 (Nopah Range) in Chicago Valley/Resting Springs Range area from suitable to non-suitable, Class L.
	30	Change western portion of WSA 271 (Woods Mountain) from non-suitable to suitable.
	31	Change Section 35, T. 11 N., R. 12 E., from C to M.
	32	Change north and west portions of WSA 250 (Kelso Dunes) from Class C to L.
	34	Change WSA 217 (Bighorn Mountains) east of Rattlesnake Canyon from suitable to non-suitable, Class L.
	36	Change Black Mountain portion of WSA 217 (Bighorn Mtns) from non-suitable to suitable.
	37	Change WSA 218 (Morongo) from non-suitable to suitable.
	39	Change portions of WSA 145 (Resting Springs Range) from suitable to non-suitable: 10 square miles north and west of Shadow Mtn. to Class L, 20 square miles north of Baxter Mine to Class M and 10 square miles southwest of Baxter Mine to Class L.
	41	Change 45 square miles of WSA 157 (Little Lake Canyon) from suitable to non-suitable, Class L.
	42	Change WSA 123 (Hunter Mountain) from suitable to non-suitable, Class L; designate as an ACEC.
Eastern San Diego County Plan	43 to 46	Adjust boundaries of WSA CA-060-024 (Sawtooth)
Other	47	Change upper part of Pleasant Canyon from Class L to M.
	48	Change Olancha area from M to I.
	49	Allow stopping, parking, and camping within 300 feet of roads rather than 100 feet.

Category	Number	Description
.	50	Increase size of Arroyo Salada open area.
	51	Change WSA 305 (Sheephole Mountains) from suitable to non-suitable, Class L.
	52	Change portion of WSA 148 (Greenwater Valley) from suitable to non-suitable, Class L.
	53	Change procedures for dealing with wilderness recommended as suitable, but rejected by Congress.

ENVIRONMENTAL CONSEQUENCES

Impacts have been assessed for both accepting and rejecting each amendment, as well as impacts resulting from acceptance of alternatives to several of the amendments. Table S-1 summarizes those impacts.

TABLE S-1

CANDIDATE AMENDMENTS ---- SUMMARY OF IMPACTS

X = POSITIVE IMPACT — = NEGATIVE IMPACT

Amendment No.	Amendment	RESOURCES								USES				✓
		Soil - Air - Water	Vegetation	Wildlife	Horses/ Burros	Cultural	Native Americans	Wilderness	Visual Resources	Grazing	Recreation	Lands	Energy/ Minerals	Preferred Alternative
1.	Communication Sites											X		✓
2.	G-E-M Guidelines												X	✓
3.	Motorized Vehicle Element										X			✓
4.	Water Quality													
	Alternative A			+										
	Alternative B													
	Alternative C			+										✓
5.	Panamint Dunes													
	Alternative A			–		–		–			X			
	Alternative B			–		–					X			✓
6.	Bartsow/Vegas Race Course			–		–					X			✓
7.	Rasor Open Area													
	Alternative A			–		–			–		X			✓
	Alternative B	–		–		–			–					
	Alternative C			X		X			X		–			
8.	Dry Lakes			–		–					X			✓
9.	Afton Cyn Allotment			–		–				X				✓
10.	Afton Cyn Allotment			–		–				X				
11.	Cronese Lake Allotment			–		–				X				✓
12.	Granite Mtn Allotment													
	Alternative A			–		–				X				
	Alternative B			–		–								
	Alternative C									X				✓
13.	Kelso Dunes Area - Grazing									X				✓
14.	Range Suitability Criteria													✓
15.	New ACEC (Big Sand Spg)		X	X		X								✓

TABLE S-1 (CONTINUED)

Amendment No.	Amendment	RESOURCES								USES				Preferred Alternative
		Soil - Air - Water	Vegetation	Wildlife	Horses/ Burros	Cultural	Native Americans	Wilderness	Visual Resources	Grazing	Recreation	Lands	Energy/ Minerals	
16.	ACEC 36 - relocate/rename		X											✓
17.	ACEC 29 - Halloran Wash					X								✓
18.	East Mojave Scenic Area													
	Alternative A								—					
	Alternative B													✓
19.	Rand Mtn Area													
	Alternative A			—		—			—	—				
	Alternative B			X		X					—			
20.	Planning Unit 32													
	Alternative A			—		—								
	Alternative B			—		—								
21.	Planning Unit 34													
	Alternative A			—		—		—						
	Alternative B					—					X			
22.	Planning Unit 38													
	Alternative A			—		—			—	—	X			
	Alternative B			—		—		—	—	—				
	Alternative C									—	X			✓
23.	Planning Unit 36													
	Alternative A			—		—				—				
	Alternative B			—		—				—				
	Alternative C			—		—				—				
24.	Round Mtn/Grapevine Cyn			—		—				—				
25.	Red Cloud Mine					—			—					✓
26.	Imperial Sand Dunes		—											✓
27.	WSA 117 (Saline Valley)													✓
28.	WSA 150 (Shaw Mine)			—									X	✓
29.	WSA 150 (Chicago Valley)			—		—		—					X	✓

TABLE S - 1 (CONTINUED)

Amendment No.	Amendment	RESOURCES								USES				Preferred Alternative
		Soil - Air - Water	Vegetation	Wildlife	Horses/ Burros	Cultural	Native Americans	Wilderness	Visual Resources	Grazing	Recreation	Lands	Energy/ Minerals	
30.	WSA 127 (Woods Mtn)			X		X		X						✓
31.	WSA 250 Section 35, T11N, R12E												X	✓
32.	WSA 250 (Kelso Dunes)			–				X						✓
34..	WSA 217 (Bighorn Mtns)		–	–				–		X	X			✓
36.	WSA 217 (Black Mtn)			X		X		X					–	
37.	WSA 218 (Morongo)			X		X		X						
39.	WSA 145 (Baxter Mine)													
	Alternative A		–	–		–		–					X	
	Alternative B		–	–		–		–					X	✓
41.	WSA 157 (Little Lake Cyn)			–		–		–		–				
42.	WSA 123 (hunter Mtn)			–		–		–					X	
43.	Sawtooth WSA - Delete area CA-060-024C							–						✓
44.	Sawtooth WSA - Cherry-stems													✓
45.	Sawtooth WSA - NE boundary					–					X			✓
46.	Sawtooth WSA - Portrero Area													✓
47.	Pleasant Cyn													✓
48.	Olancha Area					–		–	–					
49.	Roadside Camping	–									X			✓
50.	Arroyo Salada Open Area													
51.	WSA 305 (Sheephole Mtn)													
	Alternative A			–				–	–					✓
	Alternative B			–				–	–					
52.	WSA 148 (Greenwater Valley													
	Alternative A			–		–		–	–				X	✓
	Alternarive B			–		–		–	–				X	
53.	Non-enacted WSAs													✓

SELECTION OF PREFERRED ALTERNATIVE

Based in part upon the amendment-specific impacts, the results of the public review of the draft EIS, and the recommendations of the Desert District Multiple Use Advisory Council, a preferred alternative was selected, either to accept, reject, or accept an alternative version of each amendment. This choice does not represent a final decision, but simply indicates a preliminary recommendation to be presented in the final EIS for public review and comment. Final decisions will be published 45 days after the release of this document. The cumulative impacts of this preferred alternative are presented in Table S-2 below:

Table S-2
SUMMARY OF CUMULATIVE IMPACTS

Resource	Unit of Measure	No Action	Preferred Alternative	Percent Change	New Percent Of Desert
Multiple Use Class (CDCA)					
C	Acres	2,083,000	1,840,150	-12%	15.1% (17.3)*
L	Acres	5,864,000	6,069,540	+3%	50.1% (48.5)*
M	Acres	3,356,000	3,370,560	0	27.8% (27.5)*
I	Acres	503,000	522,610	+4%	4.3% (4.1)*
Unclassified	Acres	314,000	314,000	0	2.6% (2.6)*
Multiple-Use Class (Eastern San Diego County MFP Area)					
C	Acres	41,776	35,856	-14%	36.3%
L	Acres	42,510	48,430	+14%	49.0%
M	Acres	14,616	14,616	0%	14.8%
Cultural Resources and Native American Values					
ACECs Receiving Greater Protection:					
Halloran Wash	Acres	0	1,130	N/A	
ACECs Which May Suffer Significant Adverse Impacts:					
Crucero/Mesquite Hills ACEC	Acres	0	1,550	N/A	
Cronese Lake ACEC	Acres	0	2,000	N/A	
Total	Acres	0	3,550	N/A	

*Percent of Area in Original Plan

Resource	Unit of Measure	No Action	Preferred Alternative	Percent Change
Very High Sensitivity Areas Affected				
Closed to Open	Acres	0	2,973	N/A
Class C to Class L	Acres	0	8,278	N/A
Class C to Class M	Acres	0	0	N/A
Class L to Class M	Acres	0	19,346	N/A
Wildlife				
ACECs Added	Acres	0	260	N/A
HMPs Affected[1]				
I	Number	0	1	N/A
	Acres	0	13,900	N/A
M	Number	0	1	N/A
	Acres	0	8,450	N/A
L	Number	2	1	N/A
	Acres	22,350	5,900	N/A
C	Number	1	0	N/A
	Acres	5,900	0	N/A
Bighorn Sheep Habitat[1,2] Affected				
I	Acres	0	0	N/A
M	Acres	0	4,000	N/A
L	Acres	4,000	44,500	N/A
C	Acres	44,500	0	N/A
Desert Tortoise Habitat[1,3] Affected				
I	Acres	0	0	N/A
M	Acres	0	8,500	N/A
L	Acres	8,500	51,000	N/A
C	Acres	51,000	0	N/A
Mohave Ground Squirrel[1,4] Crucial Habiat Affected				
I		0	0	N/A
M		0	0	N/A
L		0	0	N/A
C		0	0	N/A
Livestock Grazing				
Ephemeral Allotments	Number	18	16	-11
	Acres	1,610,699	1,517,879	-6

Resource	Unit of Measure	No Action	Preferred Alternative	Percent Change
Ephemeral/Perennial Allotments	Number	63	65	+3
	Acres	2,247,906	2,462,131	+10
Perennial Allotments	Number	13	13	0
	Acres	749,668	749,668	0
Recreation				
Open Sand Dunes	Number	4	5	+75
Dry Lakes - Open	Number	7	7	0
- Partially	Number	3	7	+133
Motorized Vehicle Access				
Open	Acres	503,000	523,000	+4
	% of CDCA			
Limited	Acres	9,220,000	9,304,000	+1
	% of CDCA			
Closed	Acres	2,089,000	1,978,000	-5
	% of CDCA			
Point-to-point race courses/corridors	Number	3	4	53

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[1] Acreage figures represent only those acreages changed if the "preferred alternative" is accepted.

[2] Includes all permanent, seasonal, and transient bighorn sheep range.

[3] Includes all tortoise habitat estimated at more than 20 tortoises per square mile.

[4] Crucial habitat is that portion of the range selected in the Desert Plan for specific management of the species.

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CHAPTER I

AMENDMENTS

CHAPTER I

AMENDMENTS

INTRODUCTION

Forty-nine proposed amendments to the California Desert Plan have been accepted for consideration. Each amendment has been considered idividually for either acceptance or rejection. The rejection of an amendment represents the "no action" alternative. Additional alternatives have been proposed for several of the amendments which present modified versions of the amendment.

Each amendment, together with the proponents rationale for decision, the Bureau's preferred alternative (acceptance, acceptance of a modified version, or rejection), and the rationale for the preferred alternative, are presented in Table 1-1. The preferred alternatives for several of the amendments have been changed from those recommended in the Draft EIS. Amendments proposed for rejection by the Draft EIS which are now recommended for acceptance include the following:

Amendment 30	Change western portion of Woods Mountain WSA from non-suitable to suitable

Amendments proposed for acceptance by the Draft EIS which are now recommended for rejection include the following:

Amendment 20	Change P.U. 32 from Class L to Class M
Amendment 21	Change P.U. 34 from Class L to Class M

Modified versions of several amendments are recommended by the final EIS. These include amendments 4 (Water Quality Guidelines), 5 (Panaming Dunes), 6 (Barstow-to-Vegas Race), 12 (Granite Mountains Grazing Allotment), 18 (EMSA boundary adjustment), 22 (Planning Unit 38 class change), 32 (WSA 250, Kelso Dunes), and 39 (WSA 145, Resting Springs Range).

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	DESERT-WIDE AMENDMENTS			
1	Change MUC guidelines on communications sites (p. 16). Allow new communications sites in Class L (same as Classes M and I) subject to NEPA requirements.	At present, in Class L, communication sites are allowed in only a few specified locations, the intent being to identify future communication sites through the entire planning period. This has not been very practical, since only four sites were identified. As a result, more and more requests are being made for new sites, mostly in Classes L and M.	Accept	A more realistic means of dealing with siting these facilities. Original process lacked flexibility to consider changing technology and facility needs by restricting these facilities to four sites.
2	Revise Multiple Use Class Guidelines relating to geology, energy, and mineral resources. See Chapter 4 for text of revised guidelines.	Changes required due to modifications of Bureau 3809 regulations.	Accept	Original guidelines must be modified to conform to new guidelines (by the time the latter are finalized).
3	Revise Motorized Vehicle Element of the Plan. See Chapter 4. All references to route approval shall be interpreted consistent with the amendment language.	Changes required in response to management experience since completion of Desert Plan.	Accept	New element developed in response to experience gained by route designation process. Some modifications of element have occurred since draft EIS. See revised element in Chapter 4.
4	Change Water Quality Guidelines. Under Classes L, M and I, one of the following two statements should replace the words "minimize degradation": Alternative A: "To provide for the protection and enhancement of all surface and groundwater resources." Alternative B: "...of surface and groundwater resources where appropriate.	Water quality and quantity in the California desert are limiting factors which influence survival of desert wildlife and habitat. A policy of "minimal degradation" of any water resources is unacceptable.	Accept Alt. C	Classes I and M are intended to provide for more intensive uses than classes C and L. Therefore, the wording proposed by Alternative A, which is essentially that for class C is inappropriate for these classes. However, such wording is appropriate for the limited uses mandated by class L, with the exception noted for short-term degradation.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	Alternative C: No change under classes M and I. Under Class L change entire statement to: "Areas designated in this class will be managed to provide for the protection and enhancement of surface and groundwater resources, except for instances of short-term degradation caused by water development projects. Best management practices, as outlined in Section 203 of the Clean Water Act, and subsequently developed by the Bureau during the planning process, will be used to avoid degradation and to comply with Executive Order 12088."			
	SITE-SPECIFIC VEHICLE ACCESS			
5	Change designation of the Panamint Dunes from closed to partially open to allow limited dune buggy use. Develop a management plan to protect sensitive resources. Two alternatives are considered: Alternative A: Change 10,550 acres in Panamint Valley from closed to open. Alternative B: Change only 2,400 acres containing Dunes.	Inyo County has limited opportunities for this type of recreation use. Use of the Panamint Dunes would provide an alternative to prevent illegal use of the Eureka Dunes.	Accept Alt. B	There is no class "part open." To accept this recommendation requires an open/close decision. Furthermore, open/close makes no vehicle type distinction except motorized/nonmotorized. Thus the amendment, for continued consistency with the plan, is: Change an area in the dunes to interim open but by permit only. The area opened would only be the immediate 4 sections around the Dunes (see revised map, Chapter 4). Permits would be limited to ensure no more than 15 to 20 vehicles would use the dunes. A designated access route would connect the dunes, highway 190, and a camping area

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
				The camping area would cover approximately 1/4 section near Lake Hill. It's exact location will be subject to Class III cultural inventory. Avoidance or mitigation within the final site will be conducted in accordance with section 106 of the National Historic Preservation Act of 1966. Dune access would be limited to the existing route. Inyo County would be invited to join the Bureau for cooperative implementation of this proposal. This cooperative partnership would include enforcement responsibilities. The "open" designation would be an interim arrangement until final congressional action on the Wilderness Study Area which contains the dunes. An existing demand for limited recreational use of the dunes would be met. Use of the dunes would be monitored to determine any negative impacts and assure a proper carrying capacity.
6	Establish a motorcycle race course running from Alvord Road to Sloan, Nevada, to be called the Barstow-to-Vegas course.	There is a great desire on the part of the off-road vehicle community to add this course to the Plan.	Accept	Most of the proposed route has already been impacted by past competitive events and present uses. Competitive Barstow-to-Vegas races have been run in the past, and there is a great demand to reinstate this event. In addition, one new course option has been added. Monitoring and compliance would be paid for by race sponsor. See Chapter 4 for revised revised maps and stipulations.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
7	Rasor Open Area. Three alternatives proposed:		Accept Alt. A	Alternative A establishes an enlarged boundary for the open area which corresponds to actual on-the-ground use in that region and is defined by topographic features. Signing would be required to restrict use to north of the railroad.
	A. Expand Rasor Open Area	The present boundary is not manageable because it splits many of the traditional use areas and it provides an insufficient area for free play and competitive events.		
	B. Expand Rasor Open Area to the east to include part of Devil's Playground.	Increase opportunities for off-road vehicle play.		
	C. Close Rasor Open Area. Change to Class M.	It is proving difficult to contain ORV use within the boundaries of the area, and considerable spill-over damage is occuring, especially to the fragile archaeological resources south of the Crucero railroad crossing. There is also increasing traffic between Afton Campground and the open area.		
8	Change the designation of the following dry lakes from closed to that listed below:	These lakes are currently listed as closed, although the intended management is to allow limited vehicle use.	Accept With Modification	These lakes still reserved for land sailing. What is provided is access for vehicles transporting land sailors. No other vehicle use permitted (i.e., motorcycles, ATVs, four-wheel drives). Approved routes would include, for example, an existing graded road across Silver and a tank trail across Coyote. Changes in Superior land-sailing activities; this activity was the reason the lakes were originally closed to motorized vehicles.
	Soda Dry Lake - Closed, except for approved routes of travel. On such route would be the Mojave Road and a route to be used for Amendment 6.			
	Silver Dry Lake - Closed, except for approved routes of travel or by permit.			
	Coyote Dry Lake - Closed, except for approved routes of travel.			
	Superior Dry Lake - Closed, except for approved routes and for access by vehicles associated with landsailing activities.			
	Harper Dry Lake - Same as Superior. In addition, closed within 100 yards of wetland wildlife habitat.			

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	GRAZING			
9	Change Afton Canyon Alltoment from ephemeral to ephemeral/perennial with a carrying capacity of 2795 AUMs adjusted by -699 AUMs for condition class and -37 AUMs for bighorn sheep, leaving an available livestock allocation of 2059 AUMs.	Recent field examinations have shown a good base of perennial grasses in the allotment.	Accept	No increase or decrease in use would occur that would not occur in any case if this were an ephemeral allotment. This is just a bookkeeping change to reflect the actual on-the-ground situation.
10	Expand Afton Canyon Alltoment to the east to the proposed Bristol Mountain Allotment.	Recent field examinations have indicated that a good amount of forage exists to the east of the present allotment.	Reject	No arrangement for leasing intermingled private lands has yet been made. In addition, acceptance of a smaller Granite Mountain Allotment expansion eliminates the need to create a manageable, abutting boundary with the Afton Canyon Allotment.
11	Change Cronese Lake Alltoment from ephemeral to ephemeral/perennial with carrying capacity of 1508 AUMs, all of which would be allocated to livestock.	Recent field examinations show the allotment to have a good base of perennial grasses.	Accept	No increase or decrease in use would occur that would not occur in any ephemeral allotment. This is just a bookkeeping change to reflect the actual on-the-ground situation.
12	Enlarge the Granite Mountains Allotment by adding the area containing the Bristol Mountains. With the addition and extension of pipelines, consider three alternatives: A. Manage as ephemeral/perennial with preference for 2304 AUMs. B. Manage as ephemeral C. Manage as ephemeral/perennial, excluding Mtns with preference for 1048 AUMs.	Desire to increase the size of the present cattle operation.	Accept Alt. C	Recommendation based on suitability and forage studies. Conflicts with transient Bighorn sheep habitat would be less than under Alternatives A and B (see revised map, Chapter 4). Livestock use patterns will be noted to see how much of expansion area actually used.
13.	Reinstate the Kelso Dunes area from ephemeral to ephemeral/perennial use.	Three perennial grasses are present.	Accept	Short of fencing the entire dunes, enforcement of ephemeral designation impractical.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
14	Remove slope and distance from water criteria from range and suitability calculations.	Criteria is not applicable to California Desert. grazing situation.	Accept	Criteria are arbitrary, and don't reflect seasonal variations in livestock use. Other controls already built in (condition, class, rest, and present Desert Plan allocation). Additionally, excluding areas from calculations of carrying capacity due to these criteria carries potential implication that these areas are excluded from the lease, which is not the intent of the Desert Plan.
	AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACECs) AND SPECIAL AREAS			
15	Establish a new ACEC at Big Sand and Little Sand Springs.	These springs provide the only natural water in northern Death Valley. Habitat supports a variety of migratory birds, and bighorn sheep have been known to water here. The Sodaville milk vetch occurs here and is proposed for listing as an endangered specie by the Fish and Wildlife Service. The area is being severely trampled by burros and cattle. The spring mounds at Big Sand Springs are being eroded by livestock and burros. Livestock water will be provided, as it is now, but spring sources and associated lush vegetation will be protected through intensive management. Water for wildlife will be developed.	Accept	Environmental values warrant protection and would benefit from ACEC management.
16	Relocate ACEC 36 from present location to T 11 N, R 6 W, Section 26, and change name from North Harper Lake to Eriophylum ACEC.	The present location was examined and no plants were found. The new location contains plants. The species is on the California Native Plant Society's rare plant list and is on the FWS March 1 list.	Accept	Environmental values warrant protection, and would benefit from ACEC management.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
17	Enlarge Halloran Wash ACEC to include Halloran Spring and the associated petroglyphs. Change management prescriptions to include those proposed in the Halloran Spring ACEC Management Plan when completed and approved.	The Halloran Spring petroglyphs are close to the road and susceptible to vandalism and theft. The present boundary leaves out some of the most important petroglyphs and prehistoric remains in that area. The change would bring approximately 120 more petroglyphs within the ACEC boundary.	Accept	Environmental values warrants protection and would benefit from ACEC management.
18	Modify the northern boundary of the East Mojave Scenic Area: Alternative A: Delete area around Clark Mountain. Alternative B: Delete only area immediately adjacent to Cal Coal Molycorp sites.	Current boundary includes Molycorp's Mountain Pass operation, which supplies 60 percent of the world's rare earth requirements.	Accept Alt. B	Several proposed amendments were submitted for boundary or class changes in this area. The others have been have been deferred for future consideration for reasons specified in Appendix D. This amendment addresses two specific concerns: the exisitng Molycorp operation and the proposed Cal Coal/Ivanpah power generating site. Acceptance ends conflicts between scenic area designation and large scale development. Boundary adjustment has been modified from that presented in Draft EIS so that only region immediately surrounding Molycorp and Cal Coal/Ivanpah are to be excluded (see revised map, Chapter 4).
	MULTIPLE USE CLASS CHANGES NON-WILDERNESS			
19	Rand Mountains. Two alternatives proposed:		Reject	Class M best serves both points of view. Class L is already designated in the adjacent Fremont Valley and the Desert Tortoise Natural Area. Class I use would not provide adequate protection for wildlife habitat since ORV use could and would occur throughout.
	A. Change Rand area from Class M to Class I.	Due to traditional use patterns and the nature of the terrain, this area would be more appropriately managed as Class I. The number of routes of travel in the area precludes management of "existing" routes.		
	B. Change Rand/Fremont Valley area from Class M to Class L.	This area is highly crucial habitat for desert tortoises. ORV use on the numerous roads and trails is causing damage and losses to tortoises and their habitats. The BLM cannot effectively prevent ORV users from travelling off existing roads and trails, so the network of trails is expanding. Vehicle users kill tortoises and widen existing trails.		

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
20	Change P.U. 32 from Class L to Class M. Two alternatives proposed:		Reject	In practice, a change from class L to M would have little long-term effect on existing mining operations. Mojave ground squirrel crucial habitat extends farther west than indicated by Draft EIS; therefore, Alternative B would not alleviate wildlife conflicts. The Naval Weapsons Center has indicated concern that increased recreation use under class M could conflict with military operations. proponents desires can be met through route designation process.
	A. Change all of P.U. 32 currently in Class L to Class M.	This area, which has been heavily impacted by a tremendous amount of past and present mining, was improperly classified as Class L. The area should be redesignated as Class M.		
	B. Change only area that has been heavily mined from Class L to Class M.	See above. This alternative would keep cultural resources areas and Mojave Ground Squirrel HMP under Class L management.		
21	Change P.U. 34 from Class L to Class M. Two alternatives proposed:		Reject	Changing class L to class M would have little long-term effect on existing mining operations. Approval of amendment 6 does not require a change of class in the area.
	A. Change all of P.U. 34 currently Class L to Class M.	This area has been extensively impacted by past and present mining; numerous motorcycle race courses are located within the region.		
	B. Change only checkerboard area from Class L to Class M.	Remainder of area is less heavily roaded and mined.		
22	Stoddard East Area (P.U. 38). three alternatives proposed:		Accept Alt. C	This alternative will change only that portion of the planning unit currently Class L to Class M that is presently receiving heavy ORV use and which could serve the demand for a camping area. Keeping the northern portion class L would continine protection of wildlife and cultural resources, and reduce conflicts with livestock grazing.
	A. Change the Cinnamon Hills area from Class L to Class M.	The area is a heavy ORV use area. A large amount of ORV-related camping occurs in the southern part of the area by users of the Johnson Valley open area. Existing mining activity occurs in the upper part of the area of proposed change.		
	B. Change all of Unit 38 presently classified Class L to Class M.	Large amount of ORV activity is such that it would be more appropriate to manage the entire Stoddard East area as Class M. There is much private land in the area and some mining.		
	C. Change approximately 8 sections adjacent to Johnson Valley Open Area to class M to allow camping.			

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
23	Change P.U. 36 from Class L to Class M. Three alternatives proposed:		Reject	The majority of the unit is an area of rugged topography which is not heavily used by off-road vehicles. Heavy use areas (i.e., Turtle Valley) were changed to Class M in a 1981 amendment. Sensitive resources (i.e, cultural and wildlife) occur in this area.
	A. Change all of P.U. 36 presently classified Class L to Class M.	The area has been, and continues to be, heavily impacted by ORV free play. The designation would be more appropriate as Class M.		
	B. Change all of P.U. 36 to Class M except Southwest portion of Granite Mountains.			
	C. Change only area north of Granite Mountains to Class M.			
24	Change Round Mountain/Grapevine Canyon area from Class L to Class M.	The area is criss-crossed by routes of travel, has many mining claims, and is heavily used by local residents.	Reject	This is a scenic area, with sensitive resources. The needs of the local residents could be met by the route designation process.
25	Change Red Cloud Mine area from Class L to Class M.	The area has many routes of travel, much mining activity (both past and present) as well as several residents.	Accept	This area is currently receiving significant amounts of use; Class M management could be in greater accordance with the actual on-the-ground situation.
26	Change the Gordon's Well area of the Imperial Sand Dunes from Class L to Class I.	At the time of Plan development, access across the Coachella Canal was unavailable, making the region manageable as Class L. Later, the Imperial Irrigation District opened the bridge across the canal, allowing the public to use the area. Class L management is not consistent with the existing use in the area.	Accept	The bridge cannot be effectively closed. Under the current Class L Open; access is allowable but not camping. With access, the public can camp now and does. Even forcing people to camp across the canal will not alleviate the problem. The area has historically been used. The central core of the Class L area should not be impacted since there is little use between here and the Gecko open area.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	CHANGES IN WILDERNESS DESIGNATION			
27	Change suitable recommendation of approximately 2 square miles of WSA 117 (Saline Valley) to non-suitable status in the vicinity of the Victor Cons Mine; manage as Class M.	This is not a roadless area, being less than 5,000 acres. Mineral resources are indicated here by the Desert Plan. Potential expansion of talc mining.	Accept	Only two square miles would be required; the manageability and integrity of the wilderness area would not be adversely affected.
28	Change suitable recommendation of 3 square miles of WSA 150 (Nopah Range) near Shaw Mine to non-. suitable, Class L.	This portion of the Nopah range has "red" potential for locatable minerals (see Map 12 of the Desert Plan).	Accept	Only 3 square miles of the northern tip of WSA 150 would be involved; the manageability and integrity of the WSA would not be adversely affected.
29	Change recommendation of a portion of WSA 150 (Nopah Range) in Chicago Valley/Resting Springs Range to non-suitable, Class L.	Resting Spring Range has "red" and "blue" potential for locatable minerals (see Map 12 of the Desert Plan).	Accept	Mineral potential, particularly for borates, is good in this area. While it is a rather large area, it lies on the periphery of the WSA, and would not result in an unmanageable wilderness.
30	Recommend the western portion of WSA 271, (Woods Mountain), as suitable for wilderness designation.	This area is an exceptional candidate for wilderness designation. Local residents support such designation. The minerals potential of the WSA is outside of the proposed area, in the Hackberry rather than the Woods Mountains. Most motorized vehicle recreation also occurs in the Hackberries . The area contains outstanding examples of petroglyphs, and is one of the most outstanding prehistoric art sites in eastern California.	Accept	Woods Mountains natural values have been described by the preceding column. These values were stressed by large numbers of commentors, nearly all of whom recommended wilderness suitability. The San Bernardino County Planning Department has offered to cooperate with the Bureau to eliminate the manageability problem noted in the Draft EIS regarding saleable Mojave Yucca.
31	Change Section 35, T 11 N, R 12 E, WSA 250, from suitable to non-suitable Class M.	Would allow construction of a millsite next to railroad and utilities and would allow working of low adjacent dunes. The section is a sandy flat dominated by creosote vegetation.	Accept	Impacts of this change on the wilderness area would be insignificant and would in no way affect wilderness manageability.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
32	Change recommendation of portions on the north and west WSA 250 (Kelso Dunes) from suitable to non-suitable, Class L.	The west boundary change would reduce by 5,000 acres the amount of private land located within the suitable portion of the WSA. The northern boundary adjustment would provide for a larger zone of land around the town of Kelso unencumbered by the strict regulations on use associated with wilderness. None of the spectacular dunes are in either of these two areas.	Accept as modified	Only the lands north of the Dunes would be changed to class L. The WSA was recommended suitable primarily because of the Kelso Dunes, which are south of these parcels. While elimination of mixed-ownership lands to the west would improve wilderness manageability, the same could result from acquiring these lands through land exchange. As this course of action has not been thoroughly explored, it would be premature to change the western 7760 acres from C to L
33	WSA 265 (New York Mountains) See Appendix D, Amendments Not Considered			
34	Change the part of WSA 217 (Bighorn Mountains) east of Rattlesnake Canyon from suitable to non-suitable, Class L.	New information on existing vehicle routes and mining claims within the WSA make it difficult to manage as wilderness.	Accept	An on-the-ground review revealed more extensive and additional development than previously identified. The manageability of the remaining suitable area would be enhanced, while motorized vehicle access to the eastern portion would be provided.
35.	Change WSA 262 (South Providence Mtns) from suitable to non-suitable, Class L. Deferred for USGS reports - see Appendix D, Amendments Not Considered.			
36	Change Black Mtn portion of WSA 217 (Bighorn Mtns) from non-suitable to suitable, and accept Amendment 34.	Black Mountain has no known mining claims or routes of travel. There are no known resource conflicts.	Reject	Wildland values can be adequately protected as Class L. Acceptance of amendment #34 would leave this area a small, isolated tract if recommended suitable.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
37	Change WSA 218 (Morongo) from non-suitable to suitable.	The area has outstanding wilderness qualifications, is close to urban populations, has no land ownership problems, no mining claims, no intrusins, and has public support.	Reject	While many resource values exist, Class L would suffice for their protection. The abutting urban area makes wilderness integrity difficult to maintain.
38	WSA 348 (Chuckwalla Mtns) - See Appendix D, Amendments Not Considered.			
39	Change recommendation portions of WSA 145: Alternative A: 20 square miles north of Baxter Mine to non-suitable Class M; 10 sq miles near Shadow Mtn to non-suitable Class L; and 10 sq. miles southwest of Baxter Mine to non-suitable, Class L. Alternative B: Change entire WSA to non-suitable, managing as Class M at Baxter Mine, Class L elsewhere.	These portions of the Resting Springs Range have "red" and "blue" potential for locatable minerals (see Desert Plan, Map 12).	Accept Alt. B	The Baxter Mine area possesses medium-to medium high potential for metallic minerals, and current access works against maintaining wilderness values. Deletions in center of WSA render management of the remaining area as suitable to be impractical. Presently known mineral values indicate that additional high cost inventory can be saved by changing the recommendation now.
40	WSA 362 (South Algodones) - See Appendix D, Amendments Not Considered			
41	Change 45 square miles of WSA 157 from suitable to non-suitable.	Conflict between "yellow" zone on Desert Plan map 12 (unqualified potential for locatable mineral resources) and WSA recommendation.	Reject	Mineral values are speculative. This area is to be inventoried by the Geological Survey; the suitability recommendation could be reconsidered better after that survey.
42	Change WSA 123 from suitable to non-suitable; designate as an ACEC.	An ACEC management plan would protect sensitive environmental resources. More intensive mining and cattle operations could occur than under wilderness designation.	Reject	Wilderness values are extremely high. Existing grazing could continue as a "granfathered" use. Mineral potential varies from low to low-medium.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	EASTERN SAN DIEGO COUNTY PLAN			
43	Sawtooth WSA. Delete area CA-060-024C and recommend area "C" as non-suitable, Class L. This amendment contingent upon approval of amendment 45.	If amendment 45 is accepted, then area C will overlook Class L non-suitable land and will be difficult to manage for a wilderness experience due to intrusions of sights and sounds of man.	Accept	Accepting Amendment 45 would isolate this parcel from remainder of Sawtooth WSA and increase sights and sounds of man.
44	Sawtooth WSA. Delete cherry-stemming as indicated on map (Appendix A, Draft EIS), and add a small section of cherrystemming as indicated.	The roads to be deleted are not needed, as they are not maintained and do not serve any developments. The roads to be added correct a change in the original inventory in which a cherrystem was incorrectly mapped.	Accept	Wilderness manageability would be enhanced. Amendment addresses actual on-the-ground situation.
45	Sawtooth WSA. The northeast boundary of area CA-060-024B of the suitable portion should be pulled back to correspond to road A on the map (see Appendix A); the deleted area should be managed as	The areaqbounded by Canebrake Wash, North Wash, Road A on the site-specific Appendix A map, and Crawford Ranch is a bajada containing some sights and sounds of man, including an old airstrip, a fence line, and maintained roads.	Accept	Area to east of road A more properly managed as Class L due to intrusions.
46	Sawtooth WSA. Add cherrystemming within the Potrero to the Sawtooth WSA, area CA-060-024B as indicated on the map. Pull back boundary of recommended suitable as indicated, and managed as Class L.	Several apiary sites and grazing developments exist that need servicing and maintaining. Access to these sites is necessary. The existing roads to these sites are apparently maintained, but were not identified in the inventory process. Boundary changes would make area more manageable and could allow a motorized access route to be constructed to serve users such as hunters.	Accept	Cherrystemming roads addresses actual on-the-ground situation. Boundary changes would move border away from agricultural area and allow access to be provided.
	OTHER			
47	Change upper part of Pleasant Canyon from Class L to Class M (Planning Unit 25, WSAs 136 and 137A).	The presence of strategic minerals makes the area a very important mining area. A change of Class is needed to allow mineral extraction.	Accept	The area has historically been mined and has been impacted. Surface disturbing activities will be controlled by an approved plan of operation under 43 CFR 3802 and 3809 regardless of class. Class M, as modified to exclude the riparian area, will more adequately reflect the existing state of exploration and development on the mining property.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
48	Change Olancha area from Class M to Class I.	Historical use of the area is as an ORV open area. While the area receives relatively little use and impact, it is an important recreational resource for Inyo County residents.	Reject	Present ORV demand is light and can be met under provisions of Class M. If use is allowed off-roads, resources could be lost.
49	Allow stopping, parking and camping within 300 feet of roads.	The Plan allows only 100 ft. on each side of road for camping, a significant decrease from the compromise reached in 1972 (300 ft. on each side). Rockhounds travel in groups and need an area which allows camping in a circle, not a line.	Accept	100 ft. presently allowed is too restrictive; 1000 ft. was also proposed. Within sensitive areas, such as ACECs, BLM reserves right to specify a narrower camping corridor.
50	Increase the size of the Arroyo Salada open area.	The nature of the terrain in this area and the presence to the current Arroyo Salada open area and the Ocotillo Wells State Vehicular Recreation Area make management as other than Class I impractical. Using highways 78 and 86 as boundaries will facilitate management. State plans to acquire the area as an addition to the Ocotillo Wells SVRA make such a change both practical and beneficial.	Reject	Current use levels and nature of use are compatible with Class M. If the State aquires intermingled private land in this area, it would then be an appropriate proponent for a class change or for acquisition.
51	Change WSA 305 (Sheephole Mtns) from Class C to Class L. Consider three alternatives: A. Change entire WSA from Class C to Class L. Designate Sheephole Dry Lake as "open". B. Change only checkerboard ownership area from Class C to Class L (see map in Appendix A).	The northern half has a checkerboard land ownership pattern. Some promising geothermal test drills have been made and some interest shown in locatable minerals. Road access exists to the Dry Lake north of Highway 62.	Accept Alt. A	Much of WSA is in a checkerboard ownership pattern. Geothermal potential exists. Wildland values can be adequately protected by Class L management; a Class C level of protection is not necessary. Use on the dry lake light and very sporodic. No adverse impacts have been identified.

TABLE 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason For Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
52	Change portion of WSA 148 (Greenwater Valley) from Class C to Class L. Consider two alternatives:			
	A. Change northern two-thirds of WSA from Class C to Class L (see map in Appendix A).	Potential for locatable minerals. WSA is crossed by County Roads, which designation as Class C could close, denying recreational access.	Accept Alt. A	The WSA is crossed by County roads and possesses several dispersed areas at low mineral potential. The remaining suitable area would still be large enough to manage as wilderness.
	B. Change only northern third from Class C to Class L (see map in Appendix A).	Most of mineral potential is in the northern portion of the WSA. Only area from County Roads north would be changed from Class C to Class L.		
53.	Change the wording on page 55, column 2, first paragraph, middle of third line, referring to designation of non-enacted wilderness areas, to read: "Areas not approved by Congress would, unless Congress directed specific management in lieu of wilderness, return without designation. They would immediately become part of a Plan amendment proposal and a public planning process would ensue as part of that year's input into the land use decision as well as consideration by the District MUAC. In the interim between Congressional rejection and the District Manager's decision, areas would be managed under the Class "L" guidelines."	The change would require the Bureau of consider the reasons for which Congress rejected the suitable recommendation in its future management of the area. This would result in a second public management decision, rather than an automatic designation.	Accept	Would requie a public analysis of alternative future management of the former WSA through the Plan amendment process.

CHAPTER II

SUMMARY OF PUBLIC COMMENTS

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CHARACTERISTICS OF THE RESPONSE

The Draft Environmental Impact Statement (EIS) on the 1982 Amendments to the California Desert Plan and the Eastern San Diego County Management Framework Plan (MFP) was released for public review on Septermber 10, 1982. Public response was so extensive that the deadline for comments was extended to January 10, 1983. A total of 648 responses was received from 808 respondents. Most of these were letters or petitions. Oral comments were received at three public hearings held in mid-October at Independence, Riverside, and El Centro and at two meetings of the Multiple-Use Advisory Council held in Victorville in August and in Blythe in November.

The vast majority of the response (95%) came from California residents. Close to nine percent of respondents reside in the CDCA, 50% in the area south of the Tehachapi Mountains, and 37% in Northern California. The response from out-of-state residents was 5% of the total. This was lower than that received for the Final EIS on the Proposed Desert Plan (1980) when out-of-stater's provided 12% of the public dialogue (see Table 2-1).

TABLE 2-1

GEOGRAPHIC ORIGIN OF RESPONSES

Origin	Responses	
CDCA	56	(8.6%)
Non-CDCA Southern California	319	(49.2%)
Non-CDCA Northern California	241	(37.3%)
Nevada, Arizona	10	(1.5%)
All Others	22	(3.4%)
Total	648	(100%)

Letters and postcards made up the bulk of the responses. Oral response accounted for 3.4% of the total. Five petitions made up barely 1% of the input but accounted for 16% of the total number of the signature (see Table 2-2).

TABLE 2-2

FORM OF RESPONSE

	Responses		Signatures	
Letters and Cards	621	(95.8%)	661	(81.8%)
Oral Responses	22	(3.4%)	18	(2.2%)
Petitions	5	(0.8%)	129	(16.0%)
Total	648	(100%)	808	(100%)

Most of the comments (87%) were submitted by individuals. Fifty nine different organizations accounted for 10% of the response. These groups were devoted to conservation (47), off-road vehicle recreation (4), minerals (3), and miscellaneous interests (5). The remainder of the comments were provided by county, state, and federal agencies (see Table 2-3).

Table 2-3

TYPE OF RESPONDENT

Respondent Type	Responses	
Individuals	569	(87.3%)
Organizations	59	(9.5%)
Government	20	(3.1%)
Total	648	(100%)

GENERAL OVERVIEW

The majority of letters contained general comments on the use or protection of the desert and specific remarks about individual amendments. Most respondents listed their recommendations on acceptance or rejection of all or part of the proposals, and a few offered alternative suggestions. Comments on the adequacy of the Draft Environmental Impact Statement were relatively few. These were offered primarily by organizations and will be responded to in Chapter 3.

The vast majority of commenters urged protection of the desert and denounced amendments which would increase the use of areas which had been designated

Class C or Class L. A few letters favored greater access for mineral exploration and off-road vehicle recreation. These comments will be summarized below, followed by a review of specific input on plan amendments.

SUMMARY OF GENERAL COMMENTS

Many letters emphasized a concern for protection of the desert environment and advocated saving the resources for future generations. A frequent complaint was that the 1982 amendments were heavily weighted in favor of increased use of the desert. The following comments were typical:

> The California Desert Plan of 1981 was potentially a sensible and balanced management tool. Proposed amendments would weaken the plan and doom some of the desert's most valued resources.
>
> The majority of these amendments would act to dismantle the years of devotion and work to a fair compromise plan that allowed plenty of space for single-use high-impact development and also set aside large areas for low-impact multiple-use.
>
> The general public wants to preserve and protect wildlife and land. Don't give in to pressure of private interests such as grazers, miners, ORVers and racers.
>
> Washington policy conspires to sell out the public trust to a few.

Amendments which proposed reduction of the amount of recommended wilderness were opposed by a great majority of respondents, while an equal number favored elevation of popular WSAs to wilderness status. A few respondents presented the opposite points of view.

Wildlife, particularly the desert tortoise and the bighorn sheep, was seen to be in jeopardy by a large number of respondents. Increased grazing was viewed as a threat to the bighorn, and increased multiple use, especially by ORVs, was predicted to endanger the tortoise. Sand-dwelling species were believed to be potential victims of increased motorized vehicle activity in sand dune areas.

Cultural resources were anther resource which many respondents wanted to save from potential effects of proposed amendments, with ORV activity being seen as the greatest threat.

Off-road vehicle recreation was not popular with the respondents as a whole. Most wished to limit it to the amount permitted in the Plan as approved in 1980, though a considerable number would have totally eliminated it, if possible. Reasons for opposing this activity were its perceived impact on vegetation, soils, cultural resources, wildlife, scenic quality, and other types of recreation. Input from the ORV organizations was sparse, but those few respondents expressed the intention to observe the rules and avoid damaging sensitive resources. There were some fears expressed about "closing up the desert, which belongs to all of the people."

Miners again spoke out in favor of opening the lands for mineral exploration and development, which, according to some respondents, is inhibited by Class C and Class L.

Amendments to the multiple-use class guidelines were opposed by some respondents who favored waiting at least three years to give them a chance to work. "Leave the Plan alone" was a common response.

SUMMARY OF COMMENTS BY AMENDMENT

Amendment 1: New Communications Sites

Comment on this amendment was light. Proponents provided no supporting reasons for their position. Opponents reasoned that protection of resources and scenic quality in Class L lands would be weakened. They stated that the amendment procedure was necessary for each new site to assure public notification and proper evaluation of environmental effects and communication benefits of proposed sites.

Amendment 2: Revise Mineral Guidelines

Response to this proposal was sparse, with a majority of respondents opposing the revision. A proponent cited the effect of delays in mineral exploration and development on the national economy.

Opponents expressed concern over elimination or reduction of public review of mineral or geothermal operations. They claimed that previous lack of public comment on plans of operation was due to the failure of the BLM to inform interested organizations of proposed plans. They also foresaw a weakening of environmental review of impacts of mining and geothermal development on sensitive resources.

Amendment 3: Revise Motorized Vehicle Element

The number of comments on this proposal was relatively small. Most of the respondents had something special to say about vehicle access and recommended further modifications in the element. Recreational vehicle users wanted greater access, while conservationists urged more protection, especially for washes and dunes.

Implementation was a major concern. The capacity of the BLM to enforce vehicle access guidelines was questioned. Strict compliance with existing regulations (43 CFR 8342.1) was emphasized.

Organizations which commented on this amendment were:

American Motorcyclist Association, District 37
California Association of Four-wheel Drive Clubs, Inc.
Los Adventureros
San Diego Mineral and Gem Society
California Native Plant Society, Southern California Chapter
Earth First
Wildlife Society, Humboldt Chapter
Committee for Green Foothills
Sierra Club
Desert Protective Council

Amendment 4: Revise Water Quality Guidelines

A majority of the respondents advocated protection of water quality and favored Alternative A. The term "minimize degradation" was interpreted as an admission that degradation is inevitable. Alternative A was seen as a positive approach to water management while Alternative B was too vague.

A few respondents felt a change in the guidelines was unnecessary. One said that the guidelines should be left alone for a few years to give them a chance to work.

Amendment 5: Open Panamint Dunes

This amendment was commented on by over half of the respondents. Many placed it among their top concerns. Almost all were against opening the dunes. Reasons are given in the following representative comments:

- Opening the dunes will cause complete destruction of rare archaeological sites.
- Damages to the environment (species, habitats, cultural resources) far outweigh benefits to recreationists.
- Increases in ORV use could endanger rare plants, nine species of rare endemic beetles, and other invertebrates.
- Action will cut 10,550 acres out of the heart of one of the finest wilderness candidates in the CDCA.
- The area's wilderness character will be destroyed, violating BLM's own Interim Management Policy for candidate wilderness areas.
- "There is no such thing as limited dune buggy use; you open the floodgates, and you can kiss the dunes goodbye."
- Don't "trade off" these dunes to preserve others.
- BLM admits that the demand for ORV use in the area is very low. Opening the dunes would attract more ORV's to this sensitive area.
- The BLM admits that there may be management problems in protecting the surrounding wilderness.

Organizations opposing the amendment were:

Rites of Passage
Committee for Green Foothills
Friends of Wildlife
California Native Plant Society, 8 chapters
National Parks and Conservation Association

West Contra Costa Conservation League
Planning and Conservation League
Ecology Center of Southern California
American Society of Ichthyologist and Herpetologists
Desert Tortoise Council
Earth First
Audubon Society, four chapters
Sierra Club, five chapters
Defenders of Wildlife
Desomount Club
Morongo Basin Conservation Association
Friends of the Earth
Wildlife Society, Humboldt Chapter
Desert Protective Council
Citizens for Urban Wilderness
Imperial Valley College Museum
Great Basin Foundation

Proponents of the amendment made the following comments:

- We believe claims that dune buggy noise deafens dune wildlife are inaccurate.

- Recommend a permit system for recreational use of dunes.

- Archaeological sites can be protected; they are not in the dunes.

Organizations favoring the amendment were:

California Association of Four-wheel Drive Clubs
American Motorcyclist Association, District 37
Los Adventureros
San Diego Mineral and Gem Society

Amendment 6: Barstow to Vegas

The proposed Barstow to Las Vegas motorcycle race received more comment than any other amendment, being mentioned by eighty percent of all commentors. It was generally regarded as the most significant amendment, and roused very strong opinions. The great majority of comments opposed the race.

Response given by those who either favored the race or favored a modified form of it included the following:

- This race right-of-way should be approved so that there may be some control over very sensitive resources.

- Details seem to have been worked out satisfactorily.

- Accept so long as mitigation measures are firmly enforced.

Organizations supporting the amendment were:

- American Motorcycle Association, District 37
- Los Avdentureros
- San Diego Mineral and Gem Society
- California Association of Four-wheel Drive Clubs, Inc.
- Prairie Dogs Motorcycle Club

Most commentors opposed the race, and many expressed a variety of reasons for doing so. These reasons include the following:

- The guidelines to control damage are unrealistic. For example, they state that the sponsor will restore vegetation (#9, p. 2-26). That is impossible.

- The Bureau's rationale for reinstating the event does not seem to reflect the reality of the diminishing numbers of riders participating in such events.

- The reincarnation of a permitted "Barstow-Vegas" is necessary to sanction the annual "protest trail rides."

- There are adequate alternative courses for holding events of this type in the California desert.

- No amount of mitigation can justify the destruction which the race causes.

- The claim that playriding at pit areas has been curtailed is false. In the 1980 Johnson Valley-Parker event, BLM reported damage in pits over areas 50% to 150% larger than stipulated.

- The claim that limitation of the number of participants to 1200...will reduce the problems encountered in the 1974 event is no doubt true. That such an event will cause enormously more damage than the "similar "events" with which it is compared is also no doubt true.

- The Barstow-to-Vegas race would cause severe, long-lasting damage to soils along the course.

- The race would cause serious damage to desert tortoise (a State protected species) habitat.

- Allowing the race course through wilderness areas violates the Interim Management Policy and Guidelines for Lands under Wilderness Review (IMP: BLM 1979).

- There is considerable question if reclamation attempts would be effective on desert soils and habitat.

- Obviously enforcement won't be effective because BLM hasn't even been able to prevent the "protest rides" from occuring.

Organizations opposing the amendment were:

- Sierra Club
- Natural Resources Defense Council
- Defenders of Wildlife
- Audubon Society
- Desert Tortoise Council
- Friends of the Earth
- The Wildlife Society, Humboldt Chapter
- California Native Plant Society
- Earth First
- Citizens for Mojave National Park
- Rites of Passage
- Ecology Task Force, Council of Churches of Southern California
- Friends of the Dunes
- Committee for Green Foothills
- Friends of Wildlife
- Friends of Madrona Marsh
- Citizens for Urban Wilderness Areas
- National Parks and Conservation Association
- West Contra Costa Conservaiton League
- Planning and Conservation League
- Hemet High Conservation Club
- Ecology Center of Southern California
- American Society of Ichthyologists and Herpetologists
- Conservation Call
- Covina Woman's Club
- Oasis Garden Club
- Desert Tortoise Preserve Committee, Inc.
- Desomount Club,
- Morongo Basin Conservation Association
- Center for Action on Endangered Species, Inc.
- The Voters Circle
- Wilderness Park Museum
- Wilderness Society

Amendment 7: Rasor Open Area

The fate of the Rasor Open Area elicited comments from over 40% of respondents. Less than a dozen favored Alternatives A or B, to expand the area to the west or east. The rest of the respondencts expressed either opposition to the amendment or a preference for Alternative C, which would change the designation of the area to Class M.

Two proponents of enlarging the open area wanted to combine Alternatives A and B and extend the area in both directions. Two organizations suggested changes which would protect sensitive resources while still enlarging the open area.

Representative comments were:

- A combination of Alternative A and B would achieve the best management and protection.
- We accept Alternative A, to increase the size of Rasor Open Area to a manageable size.
- There is a definite need for redesignation but not as proposed. The Mojave Road and Fort Soda need to be protected.
- This is a heavily used area and can be opened up without damage.

Organizations favoring enlarging the open area were:

American Motorcycle Association
California Association of Four-wheel Drive Clubs
Los Adventureros
Wildlife Society, Humboldt County

Opponents of the amendment, including those who wished to change the area to Class M, gave the following reasons:

- This ORV use should never have been designated. It is unmanageable and threatens cultural and natural values.
- Current off-road vehicle riders are already destroying archaeological sites and wiping out desert vegetation.
- The BLM's preferred Alternative A would affect petroglyphs and a turquoise quarry rich in archaeological artifacts, as well as other unrecorded sites.
- When a citizen goes on another's property and destroys anything, do our laws reward the despoiler by giving him free hand in the area? That is what BLM is recommending here.

- The Rasor Open Area is sandwiched between the Afton Canyon ACEC and the Fort Soda ACEC. Expanding the open area would have serious deleterious impacts on either or both of these important habitat areas.

- Alternative A will intensify the threat to the adjacent Mesquite Hills/ Crucero ACEC.

Organizations opposing the amendment are:

California Native Plant Association
Sierra Club
Desert Protective Council
Audubon Society
Citizens for Mojave National Park
Rites of Passage
Committee for Green Foothills
Friends of Wildlife
Citizens for Urban Wilderness
West Contra Costa Conservation League
Ecology Center fo Southern California
American Society of Ichthyologists and Herpetologists
Conservation Call
Desert Tortoise Council
Earth First
Audubon Society
Defenders of Wildlife
Morongo Basin Conservation Association
Friends of the Earth

Amendment 8: Open Dry Lakes

This proposal to change the vehicle access designation on five dry lakes in the Barstow Resource Area elicited only a modest number of comments, with opposition outweighing approval.

Among the proponents was a major conservation group which stated that it approved the amendment so long as access was only as stated and adequate control was maintained to prevent access when lakebed surfaces are wet. Land sailing was approved by those respondents who mentioned it.

Opponents were particularly concerned about Superior, Harper, and Soda Dry Lakes. Closure to motorized vehicles was recommended for Superior Lake because it is a core population area for the Mojave ground squirrel and also because of nearby military training activity. Passage across Harper Dry Lake was opposed since it is an important marsh habitat and is utilized by a great variety of birds. Closure of Soda Dry Lake was urged until the exact location of the Mojave Road can be proven.

In general, land sailing was approved but there were many reservations about motorized vehicles. To quote one respondent: "There are already seven dry lakes which are 'open'."

Amendment 9: Afton Canyon Grazing Class Change

This amendment was mentioned by a small number of respondents. Opponents greatly outnumbered proponents. The major reasons for opposition were fears of overgrazing the area and the adverse impacts of increased grazing on wildlife, particularly the Cady Mountain bighorn sheep herd. Also mentioned were the lack of an adequate environmental analysis in the DEIS and the overabundant concern for the financial benefits of the operation.

Amendment 10: Expand Afton Canyon Grazing Allotment

Comments were similar in number and content to those received on Amendment Nine. Opponents agreed with the BLM's rejection of the proposal, but for the same reasons given under Amendment Nine rather than the rationale given by the BLM.

Amendment 11: Cronese Lake Grazing Class Change

The number of comments and ratio of proponents to opponents was similar to that observed for Amendments 9 and 10.

Again, concern was shown for bighorn sheep which are transient here and for wintering shorebirds, waterfowl, and other species found at the lake. Impacts of increased grazing on archaeological sites on the shorelines of the lake were feared.

Amendment 12: Granite Mountain Allotment Enlargement

Response was similar to that for the preceding three amendments. Again, cultural resources and the desert bighorn were believed to be in jeopardy if grazing were increased. Temporary use of three WSAs for grazing was opposed because of its potential damage, in spite of the increase in benefits to the operator. Delay of such a decision until Congresss has decided on the status of these WSAs was recommended.

Amendment 13: Kelso Dunes Grazing Class Change

Comment on this amendment was somewhat greater than that for the other four grazing amendments. This was due to the continuing public interest in the Kelso Dunes. Again, the response was substantially in opposition to the proposed change. Objections were for the following reasons:

- Grazing damages dune vegetation which is needed for maintenance of nine rare endemic beatles found in the dunes.

- The fact that current efforts to keep livestock off the dunes are ineffective does not justify increasing use and does not support a grazing class change.

- The DEIS should have considered fencing the dunes as an alternative. A cost-benefit analyis should be done to support the assertion that fencing is too expensive.

- All WSAs should be, and all recommended WSAs must be, handled as wilderness until Congress acts. The current operator should protect WSA 250 by keeping his livestock off it.

Amendment 14: Grazing Criteria Change

This proposal was mentioned by over one-third of the commenters; all but seven were opposed. The predominant comment was that the criteria of distance-to-water and slope make sense and should not be eliminated. Protection of desert riparian areas was emphasized.

Amendment 15: New ACEC at Big and Little Sand Spring

This proposal for a new ACEC was greeted with enthusiasum by a large number of respondents. Only three were in opposition. Proponents stated that the new designation will protect sensitive cultural, vegetative, and wildlife resources. Opponents claimed that the area did not meet the ACEC criteria and would degrade the ACEC program; the area should be managed under a range and wildlife improvement program.

This amendment and Amendments 16 and 17 were applauded by many conservationists as positive action by the BLM in contrast to many amendment recommendtions which were strongly opposed.

Amendment 16: Relocate/Rename ACEC 36

Response to this proposal was similar to that to Amendments 15 and 17, with almost unanimous approval. Proponents supported the goal of protecting the rare plant species *Eriophyllum mohavense*. The sole opponent complained that the area is still too large to protect the plant.

Amendment 17: Enlarge Halloran Wash ACEC

This proposed ACEC enlargement was also highly endorsed as a means of protecting valuable rock art sites and discouraging vandalism. Opponents stated that an ACEC was not needed since the petroglyphs had not been harmed in the past, but that the ACEC would focus public attention on the site and mandate 24-hour protection.

AMENDMENT 18: East Mojave Scenic Area Boundary Change

Amendment 18 received more comment than any other proposal except the Barstow to Vegas race, being mentioned by over sixty percent of all commentors. Most opposed the amendment.

Those who favored either the amendment or a modification of it cited the following reasons:

- Mountain Pass operations are a significant industrial development...Including Mountain Pass in a scenic area is a strange way to advertise these benefits

- When those who propose the inclusion of industrial sites within scenic areas claim there will be no inhibitions to development, they need to explain to investors why a scenic area designation is needed at all.

- Consider modifications to retain scenic area status for the western Clark Mountain and Ivanpah regions.

Commentors opposed to the amendment most often cited reasons similar to those below:

- The Clark and Ivanpah Mountain ranges...are scenically spectacular...and are an integral part of the scenic area.

- Clark Mountain has one of the richest floral displays in the desert including 8 plant communities, three federal candidate plant species, and the largest relict stand of white firs.

- The amendment could have serious long-term impact on crucial tortoise habitat in the Ivanpah Valley.

- There seems to be no justification for this amendment.

- The National Scenic Area is an intended whole. To dismember any part of this marvelously integrated whole is to destroy the integrity of EMNSA.

- Union Oil Company should be proud to be a contributer to the diversity of EMNSA. Capitalism and scenic preservation are mutual, not antagonistic, goals.

- And now the proposed amputation of the area's spectacular northeastern corner.

Amendment 19: Rand Mountains

This amendment received vigorous response from desert tortoise protective organizations who opposed Alternative A, change of MUC from M to I, and who favored Alternative B, change from M to L. Supporting reasons were to protect crucial tortoise habitat from ORV use. Lack of protection of this area allows heavy impacts on the adjacent Desert Tortoise Natural Area. Protection of the Mojave ground squirrel, a State listed species which also inhabits the area, was also mentioned.

A few respondents favored Alternatives A and C (No Action). Supporters of the former contended that projected harmful impacts had not been documented. Those favoring Alternative C, or "no action," felt that recreationists were content with the present designation and that no change was called for.

Amendment 20: Change Planning Unit 32 from Class L to Class M

This proposal to change all or part of the Class L land in the Superior Valley region from Class L to Clas M received a moderate amount of comment. Over two-thirds of the respondents favored no action, Alternative C. The remainder leaned toward Alternative B, with a few recommending Alternative A. Reasons supporting the various alternatives were:

1) Alternative A - Approve

   - No supporting comments.

2) Alternative B - Approve

   - Change only the area that has been heavily mined.

3) Alternative C - No Action

   - Area is one of a few crucial habitats for Mojave ground squirrel.
   - Area is prime desert tortoise habitat.
   - We Barstow residents are outraged about AMA tearing up this area.
   - There are many mining claims but few active mining operations.
   - Mining claims are used for trespass, weekend use.
   - The area is adjacent to a military area used for live aerial gunnery training and bombing.
   - BLM should rehabilitate ORV areas, instead of allowing expanded and increased use.

Amendment 21: Change Planning Unit 34 from Class L to Class M

This amendment drew less comment than Amendment 20. A large majority opposed both Alternative A and Alternative B, preferring Alternative C, No Action. No supporting reasons were given by the few who favored Alternative A. Supporters of Alternative B gave the following reasons:

- Cronese Valley north of the checkerboard area deserves Class L protection.
- BLM recommendation to accept Alternative B seems driven by location of Barstow-to-Vegas race course. We could accept a tighter drawn boundary change.

Supporters of the No Action Alternative gave the following reasons:

- Increased ORV use would cause adverse impacts on cultural resources in Cronese Lake ACEC and on the habitat of migrating shorebirds and waterfowl.
- Impacts of mining and ORV use do not warrant a class change.
- Access would be increased to a long boundary of one of the heaviest-used areas on Fort Irwin. The number of unauthorized entries into Fort Irwin would be increased.

Amendment 22: Change Planning Unit 38 from Class L to Class M

The amount of input was very similar to that for Amendment 21. Respondents who favored Alternative B, change all of the Class L areas to Class M, gave no supporting reasons. Those in favor of Alternative A, change the Cinnamon Hills area to Class M, gave the following reasons:

- Cinnamon Hills is a favorite rockhound area should be kept open by existing roads.
- We accept Alternative A with reservations. We feel the northeast is heavily used for ORV free play.

The majority, who oppose any change, gave the following rationale:

- There is already sufficient provision for ORV use in the general area between Victorville and Barstow.
- We are not sure of the "need" for the change.
- Expansion gives in to the motorcycles. When is BLM going to do something to protect livestock use areas.

- Alternative A or B would adversely impact breeding grounds for golden eagles and prairie falcons in the Granite/Newberry Mountains area.

- BLM is gaining the reputation of solving enforcement problems simply by legalizing the use that causes the problem.

- Keep this magnificent mountain range as natural as possible.

Amendment 23: Change Planning Unit 36 from Class L to Class M

The number of responses on this amendment was greater than that for surrounding areas, largely because the area contains high tortoise densities. Respondents favoring Alternatives A and B gave no supporting rationale. One respondent who preferred Alternative C cited manageability of the area and land owner concerns. The substantial majority, who favored no change, agreed with the rationale used by BLM in rejecting the proposal. They also emphasized the high concentration of tortoises and the need to protect them.

Amendment 24: Change Round Mountain from Class L to Class M

Comment on this amendment was sparse. All but three respondents agreed that the proposal should be rejected. Reasons given included:

- The area is an ecotone between desert and mountain communities, unusually rich in plant and animal species.

- Protection of valuable riparian areas is crucial. Vegetation and wildlife habitat are excellent and diverse.

- The amendment would increase harmful impacts on high quality cultural resources in the Juniper Flats ACEC.

Proponents of the amendment cited the following reasons:

- Restrictions on activities may be required because of increased mining interest and activity.

- There is a need to enhance various recreational interests and access by motorized vehicles.

Amendment 25: Change Red Cloud Mine Area from Class L to Class M

The response to this amendment was heightened by a concern for desert tortoise habitat.

Proponents of the change from Class L to Class M provided only one supporting reason. The State of California may benefit since it owns some land or mineral rights within the subject area.

Opponents, who again were the great majority, gave the following reasons:

- Amendment would open up access to historic mining sites and lead to increased vandalism and litter.
- The area is important habitat for the desert tortoise. Class L protection is essential. Presently, shooting of tortoises and other wildlife is occuring.
- Would result in more ORV impact to the Chuckwalla Bench ACEC.
- This is yet another example of changing class because of inadequate enforcement.
- The boundaries are far too broadly drawn to provide "spot zoning" for the Red Cloud Mine.

Amendment 26: Change Gordon's Well Vicinity from Class L to Class I

Response to this proposal was fairly sparse. Almost one-quarter of the respondents favored the amendment, but no supporting reasons were given. One proponent accepted the proposal, but with the reservation that active efforts should be made to protect rare plants.

Opponents gave the following reasons:

- Several State-listed and rare plants occur in the area.
- Sensitive wildife species present include Couch's spadefoot toad, the Colorado Desert fringe-toed lizard, and dune insects, including Andrew's dune scarab beetle.
- Ample ORV open area is found south of Highway I-8.
- Allowing ORV activity at the south end of the dunes will encourage increased travel bewteen this area and the Glamis open area, thus increasing impacts on the currently little-used core of the dunes.

Amendment 27: Change Portion of WSA 117 (Saline) to Non-Suitable, Class M

This amendment elicited little comment. The numbers of proponents and opponents were almost equal.

Proponents stated that the area was unsuitable for wilderness.

Opponents had a few more comments, among which were the following:

- Since the DEIS states that the amendment will not have positive impacts on energy and minerals, we fail to understand the need for the change.
- Leave it as wilderness. Mining damages can be mitigated.
- The change would cause serious negative impact.
- There is no need for a change. The Victor Cons mine is on private property.
- This is another example of Inyo County chipping away at the Desert Plan.

Amendment 28: Change Portion of WSA 150 (Nopah Range) to Non-Suitable, Class M, at Shaw Mine

This was one of four amendments to change the recommendation on WSAs in Inyo County from suitable to nonsuitable, Class M or L (Nos. 28, 29, 39, 52). The amendments were treated as a group by most commenters, and were opposed by most respondents. This proposal to change three square miles of WSA 150 in the Nopah Range was approved by a small number of commenters. Individuals or agencies promoting mining supported the continual reassessment of CDCA lands for mineral values.

Opponents to the amendment gave the following reasons:

- Mineral studies have not yet been done by the USGS and if an area is not recommended as suitable, the mineral studies won't be done.
- Postpone consideration until mineral studies have been completed.
- Keep the Nopah Range as habitat for the bighorn sheep, the golden eagle and other wildlife.
- The flora is of considerable interest (examples given).

Amendment 29: Change Resting Springs Portion of WSA 150 (Nopah Range) to Non-Suitable, Class L

See Amendment 28 for general description of public input and typical comment by proponents.

Opponents made the same points on the need for mineral survey and deferment of consideration of a change in designation until this has been completed.

Also cited were the dense archaeological values and outstanding wilderness quality of the Resting Springs Area.

Amendment 30: Recommend Western Portion of WSA 194 (Woods Mountain) as Suitable

Response to this amendment was heavy. Over one-third of the total respondents commented on it, with the vast majority in favor of the amendment.

The only comment made by opponents was that Class L is sufficient to protect values.

Proponents made the following representative comments:

- The area includes many outstanding examples of petroglyphs and is a fine prehistoric are site.
- Area contains some of the largest and most pristine Mojave Yucca forests remaining in the CDCA.
- Its eroded rocky canyons are habitat for high densities of nesting golden eagles, prairie falcons, Bendire's thrashers, and other rare birds.
- There appears to be no conflicting use in the area, as mineral potential does not exist and most motorizied vehicle recreation within the WSA occurs outside the proposed recommended area.
- Non-vehicular recreational oportunities are outstanding.

Amendment 31: Change Section 35, T 11N, R 12E, From Class C to Class M

Comment on this amendment was sparse. A three-to-one majority opposed it. The only proponent offering a supporting reason urged approval, since mining takes up such a small percent of public lands in the California desert.

Opponents offered the following reasons:

- Will increase impact on dune and sand dwelling wildlife.
- The low rolling dunes will suffer habitat degradation. It is the part of the dunes that has a rich growth of wildflowers and provides prime fringe-toed lizard habitat.
- If a millsite is needed, a better site would be north of the UP tracks.
- Would cause greater ORV enforcement problems.

Amendment 32: Change Northern and Western Portions of WSA 150 (Kelso Dunes) from Class C to Class L

This amendment received a small-to-moderate number of comments, including a petition with nine signatures. The majority of respondents opposed the amendment.

Proponents of the change offered no supporting reasons.

Opponents gave the following reasons:

- Wilderness areas need large buffer zones around them.

- Make a land exchange with Southern Pacific like you did in the Granite Mountains.

- The area contains some unusual sand hummocks in part of the "Devil's Playground" and has scenic values.

- Would adversely impact prime habitats for the Mojave fringe-toed lizard and associated wildlife and plants of the dunes.

- The WSA should include the low dunes, not just the higher dunes.

- The option of land exchanges in the western portion has not been adequately explored.

Amendment 34: Change WSA 217 East of Rattlesnake Canyon From Class C to Class L

This proposal elicited comment from approximately one-third of the respondents. Most commentors opposed the amendment.

Proponents offered no supportive reasons. A few expressed regret that, according to BLM, this poriton of the WSA was overrun with roads, but accepted the necessity to recommend Class L.

Opponents argued as follows:

- The damage from ORV use is not significant when actually seen. There are no major mining developments and no outstanding potential for any such development.

- This is a lovely hiking area and the jeep tracks are really unobstrusive.

- It would be great to have a wilderness area so accessible to a major population area.

- Changing the designation would further endanger Erigeron parislii.

- Another example of allowing existing use to prevail. ORV use should be controlled and adequate management provided.

One respondent advocated a new alternative which would establish an ACEC to protect a rare plant (Erigeron parishii), cultural resources, and Native American values.

Another commentor suggested deferring the amendment to allow the ongoing route designation process to be revised according to Amendment No. 3 (if adopted), and to determine which routes would be suitable for use under the new criteria.

Amendment 36: Change WSA 217 (Black Mountain Portion), From Class L to Class C

Input was light on this amendment. Proponents outnumbered opponents; supporting reasons provided by proponents included:

- The area has outstanding wilderness, cultural and wildlife values.
- Excellent recreational opportunities, high scenic values, and interesting plant and animal communities.
- Wilderness designation would cause no management problems.
- This area should have been picked up in the initial Plan, and BLM staff should be commended for proposing it now.

The single supporting reason given by an opponent was that Class L is sufficient for this area.

Amendment 37: Change WSA 218 (Morongo) From Class L to Class C

Response to this amendment was low-to-moderate in quantity; proponents were in the majority. A few respondents combined their comments with those on Amendment 36, so all comments listed for No. 36 apply also to No. 37.

Additional reasons given were:

- Wilderness areas close to urban areas can be protected from overuse by requiring permits for entry for recreation purposes.
- This amendment would correct an apparent error in the 1980 CDCA Plan. Available data indicate that the intent was to recommend the area as suitable.
- The area has no mineral resources and no land ownership conflict, and it enjoys public support for wilderness designation.

Amendment 39: Change Two Portions of WSA 145 From Class C to Class L

See Amendments 28 and 29 for a description of volume and type of comment by proponents and opponents to these amendments. The following additional comments were made:

- BLM's Desert District study of mineral potential in the CDCA was poorly done. BLM has not given this element its real importance. Amendments like this should be accepted.

- Increased mining activities would threaten several wildlife and plant species. These include the bighorn sheep, prairie falcons, and golden eagles. Cultural resources of high sensitivity would also be affected.

Amendment 41: Change Portion of WSA 157 (Little Lake Canyon) From Class C to Class L

Nearly all of the moderate number of comments received on this proposal supported the Bureau's preferred alternative to reject this amendment. Commenters noted the need to protect sensitive and valuable cultural resources and wildlife species in the area. It was stressed that mineral values were speculative, while a change from Class C to Class L could destroy chances for future acceptance as wilderness.

Amendment 42: Change WSA 123 (Hunter Mountain) From Class C to Class L

Of the moderate number of responses received on this proposal, nearly all recommended rejection. Reasons cited included the following:

- Few areas in the California Desert afford such a superb combination of pristine habitat, cultural resouces, wildlife and solitude.

- The area...ranked second out of the 137 WSAs in the CDCA.

- Existing grazing could continue, and mineral potential varies from "low to medium."

A supporter of the amendment noted that former BLM Director Gregg stated that ACECs should be used instead of wilderness when use needed to occur.

Amendment 43, 44, 45 and 46: Boundary Changes Within the Sawtooth WSA (Eastern San Diego County Planning Unit)

Most of the relatively small number of respondents who commented on these amendments treated them as a group. Amendment 44 was generally supported; a majority opposed the other three.

A small number of general comments applying to all four amendments where made. One commenter requested deferral for one year. However, another commentor supported acceptance of all amendments providing the areas remain Class L and would not later be changed to Classes M or I.

Most commentors opposing individual amendments cited adverse impacts on cultural resources and on Bighorn sheep. The significance of the man-made intrusions was questioned, as was the need for hunter access in the area covered by amendment 46. The State of California noted that acceptance of amendments 43 and 45 would increase management problems of two adjacent State wilderness areas.

Supporting comments were of two types. First, the changes in cherrystemmed roads were accepted for reasons given in the EIS. Second, comments noted that access to apiary sites would be improved.

Amendment 47: Change Upper Pleasant Canyon From Class L to Class M

Response to this amendment was low. The majority favored rejection. The proponents of the amendment listed several points of disagreement with the DEIS. These will be addressed in Chapter 3.

Other comments of proponents were:

- I disagree with statements in the DEIS that there are bighorn in Panamints
- The DEIS does not cover the history of the mining area in this region.
- The Panamints have a unique geology with a tremendous potential of mineralization.
- Potential strategic minerals in the area are overriding objective to enhance our nation's wealth and not restrict the mining industry.
- Accept, based on unknown effect of 3809 regulations and potential restriction to approval and permitting processes done by the appropriations bill.

Opponents of the amendment offered the following supportive statements:

- The Panamint alligator lizard, Pacific treefrog, Panamint kangaroo rat, Panamint chipmunk and other wildlife species, as well as valuable riparian habitat need protection.
- As the DEIS states, change from Class L to Class M would not enhance mineral extraction but would have significant negative environmental impacts.

- Some ecological effects could be felt within Death Valley National Monument.
- Proponent's reason for submission is questioned.
- Current regulations and proposed Amendment 2 make this amendment unnecessary.

Amendment 48: Change Olancha Area From Class M to Class I

Response to this amendment was light; opponents outnumbered supporters. Representative comments favoring the amendment were:

- Its all right if ORV's stick to the roads...if they don't the opening of this area should be reversed.
- ORV's can use these dunes and not Eureka, Saline, Panamint dunes.
- Inyo County is entitled to an open area.

Comments from opponents:

- Olancha is lightly used. ORV demands can be fully met by Class M.
- A change to Class I would cause degradation of wildlife habitat.
- Reject. We want no trade-offs.
- The area has substantial environmental resources which would be adversely impacted.

Amendment 49: Allow Stopping, Parking and Camping Within 300 Feet of Roads

Only a low-to-moderate number of comments addressed this amendment. A small majority favored rejecting it, and a few could accept if certain restrictions were maintained.

Representative statements by proponents were:

- The maximum distance for parking and camping from the road should be governed by the proximity of the washes, where camping is preferred near trees along banks.
- We agree with acceptance if sensitive areas will be designated and protective rules enforced.

Representative statements from opponents were:

- Groups can camp in a line and assemble by sitting in a circle.
- Too much pulling off the road will leave larger areas impacted.
- The inconvenience caused to certain user groups is of minor importance compared to the potential habitat degradation that would occur if amendment is accepted.
- Would create a de facto open area more than 600 feet wide along all routes of travel.
- If necessary groups can get special permits for certain sites where greater width (than 200+ feet) is desired.

The following suggestions was made as an alternative to the amendment:

Reject amendment or at least retain the current 100-foot restriction and allow expansion to 300 feet in specific areas known to be used by highly sociable groups where undue habitat destruction won't occur.

Amendment 50: Expand Arroyo Salada Open Area

Comment was very light on this proposal. Nearly all those who commented opposed acceptance. Many commentors cited the presence of the flat-tailed horned lizard as a reason for rejection; commentors noted its limited habitat elsewhere in the CDCA. Management problems were also stated as a reason for rejection.

A proponent noted that the area is already managed as though it were an open area, and mentioned the potential expansion of the adjacent State Vehicular Recreation Areas as a reason for acceptance. However, acceptance was opposed by the State Resources Agency.

Amendment 51: Change WSA 305 (Sheephole Mountains) from Class C to Class L

This amendment was addressed by over 40 percent of respondents, most of whom were eager to maintain wilderness recommendation for the Sheephole WSA. Proponents of the amendment preferred Alternative A, changing the entire area to unsuitable.

Proponents made the following comments:

- This is not a wilderness, crisscrossed with tank tracks, roads, etc. and checkerboard land ownership.

- Accept Alternative A, changing WSA to Class L, but open Sheephole Dry Lake.

- We support Alternative B. It would be impossible to manage checkerboard areas because of potential for alternative access routes.

Opponents made the following comments:

The large desert valley and flanking mountain ranges are a fundamental part of the eventual California desert wilderness system, a cornerstone of the program.

- Sparseness and a sense of vastness are basic components of a natural wilderness scene in the desert.

- This is the only remaining undisturbed valley in the central California desert.

- Joint management of the checkerboard land is possible, and land exchange should be explored.

- This amendment should be deferred to provide time for public review and analysis of the opportunities for land exchanges and updated information on mineral and geothermal potential.

- The fact that "there's nothing there" is the real wilderness resource of this area.

- Sheephole Mountains contain permanent bighorn sheep range which could be impacted by geothermal development.

Amendment 52: Change WSA 148 (Greenwater Valley) From Class C to Class L

See Amendments 28 and 29 for a description of the amount and type of comment by proponents and opponents of changes in suitability recommendations for several WSAs in Inyo County.

This amendment received several additional types of responses from opponents:

- Low mineral potential is no reason to delete the thirteenth highest rated WSA in the CDCA.

- Only 10 percent of the area has mineral potential, yet you advocate recommending 62 percent as unsuitable.

- Greenwater Valley has values equal to those within adjacent Death Valley National Monument recommended wilderness.

- Flowers are always abundant there. It is scenic and a superb place for solitude.

- There is no "County Road" crossing this area.

- This is a valley like no other in the region due to its plant community, elevation, climate and soils. Eagles, falcons, and tortoise all use the area. No valley for miles can equal its natural history.

- BLM should make an effort to manage lands in a way that is consistent with the adjacent Death Valley National Monument.

Amendment 53: Disposition of Rejected WSAs

The small number of comments received on this action favored acceptance by a narrow margin. Proponents stated that the amendment would require a public analysis of alternative future management of the WSA through plan amendment. One commentor stated that Management Plans should be determined on a case by case basis.

Opponents claimed that automatic Class L status for rejected WSAs would ensure that the most protective classification aside from designated wilderness would be provided. Several commentors noted that the normal amendment process could always be used in special cases. The necessity for re-evaluating an area already subjected to intensive scrutiny during the wilderness inventory process was questioned.

CHAPTER III

SPECIFIC COMMENTS AND RESPONSES

CHAPTER III

SPECIFIC COMMENTS AND RESPONSES

This chapter presents specific comments made by individuals and organizations during the EIS public review period, and responses to those comments. Over 600 letters were received; however, most comments were opinions regarding whether or not a given amendment should be accepted. These comments have been summarized in Chapter 2. The comments presented in Chapter 3 pose specific questions regarding the EIS itself. They are direct exerpts from the original letters rather than summaries.

Table 3-1 lists the comment, the individual or organization that made the comment, and the BLM response. Where other commenters raised the same question, they are identified in parentheses. If an EIS textural revision is necessary in response to a comment, that revision is presented in Chapter 4 (Modifications and Corrections).

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
	GENERAL COMMENTS	
James Royle	I marked up Table S-1 to indicate the preferred alternatives indicated in Table 2-1 (and I really think BLM should have indicated this information in Table S-1).	Table S-1 has been revised to indicate the preferred alternative. See "Summary."
Yuma Audubon	Another assumption is that "minor" adjustments may occur as administrative actions without going through the amendment process. Examples of "minor" adjustments should be given, or better yet, the degree of changes for each plan element which would be considered "minor" should be specified as part of the Plan.	Minor adjustments in the Desert Plan are provided for by the Bureau's land use planning regulations (43 CFR 1601.6-3). These state that plans may be changed through the process of plan maintenance " to reflect minor changes in data. Such maintenance may include further refining, constraining, or documenting a previously approved decision incorporated in the Plan...Maintenance is not considered a plan amendment." An example would be a minor boundary change in an ACEC which would improve manageability while not affecting the special values for which the ACEC was established.
California Department of Parks and Recreation	Cultural resource data is insufficient. Inventories of areas potentially affected should be complete, Class III for areas of Moderate to High sensitiviy. Justification should be provided for sensitivity ratings in the document. Copies of survey reports, site records, and Determinations of Eligibility should be provided this office for review and comment.	Class III (100%) inventories for areas that may be affected by proposed plan amendments have not been carried out. Inventory of this nature would involve survey of thousands of acres, which was unfeasible at the time the draft document was prepared. Since a decision had not been reached as to which amendments would be accepted, areas of impact could not be determined at that time. Inventory will be carried out in affected areas according to the Programmatic Memorandum of Agreement on cultural resources. Copies of reports and Determinations of Eligibility resulting from these surveys will, of course, be provided for SHPO review. All sensitivity ratings in the EIS are based on Desert Plan sensitivity data, as was stated in the EIS on a number of occasions.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
California Department of Parks and Recreation	Determinations of Effect should be made in accordance with the Advisory Council's procedures (36 CFR 800) and the California Desert Conservation Area Programmatic Memorandum of Agreement (in consultation with this office).	Determinations of Effect will be sought at the proper time. Until appropriate inventory has been carried out, it would be premature to seek Determinations of Effect.
California Department of Parks and Recreation (Also Yuma Audubon)	The document identifies seveal areas where cultural resources are subject to adverse effects because of on-going land uses by the public. The California Desert Conservation Area Programmatic Memorandum of Agreement requires the Bureau of Land Management to develop and implement Special Mitigation Plans (SMP) in consultation with the State Historic Preservation Officer for these properties. May I be provided copies of SMPs which have been developed and priorities for future SMPs.	Management prescriptions for these areas will be developed as accepted plan amendments are implemented. In other areas in which cultural resources are being impacted by on-going uses, management plans will be developed on a priority basis in the course of BLM's annual planning process.
California Department of Parks and Recreation (Also Yuma Audubon)	Since these amendments either sanction or permit activities which would affect properties potentially eligible for the National Register of Historic Places, each should be considered as an undertaking subject to Section 106 of the National Historic Preservation's Act of 1966, as amended, the Advisory Council on Historic Preservation's procedures 36 CFR 800, and the California Desert Conservation Area Programmatic Memorandum of Agreement. The plan does not provide documentation that these regulations and agreements have been complied with.	Section 106 procedures and other cultural resource regulations will be followed at the appropriate time, that is, after final decisions on plan amendments have been reached and areas of impact can be defined.
Naval Weapons Center	The DEIS does not adequately assess air quality impacts. The DEIS states, "[e]xcept where specifically noted, no impacts on air quality are anticipated." Several of the proposed amendments, as described in Chapter 4, would involve heavy ORV use (Nos. 7, 20, 21, 22, and 26) or significant mineral or geothermal potential (Nos. 29, 31, 51, and 52). The implication that such plan amendments would have "no impacts on air quality" is not supported in the DEIS and is contrary to previous experience with ORV use and mineral development, particularly in an arid area. At a minimum, the FEIS should contain, for each plan amendment enumerated above, a statement on the possible extent and severity of its impact on air quality.	Several plan amendments, including those cited as well as others, may result in some impacts to air quality. The plan amendments relating to ORV use, for example 7, 22 and 26, are expected to have low to insignificant impacts on air quality. Emissions from vehicles resulting from anticipated levels of use would not present a problem. During heavy use periods, total suspended particulate values in very localized areas may exceed Federal and California State air quality standards. However, particulate values would return to background levels within a few days following periods of heavy use. Plan amendments may eventually result in activities such as geothermal development. At this time, these developments cannot be adequately evaluated. It is antipated however, that restrictions and mitigating measures will keep impacts low.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
Judith Anderson (Also Natural Resources Defense Council)	My reading of the Federal law concerning assessment of impacts says that cumulative impacts are to assessed. Where was that? On what page did you really assess the cumulative impact on desert biota from increasing all the grazing allotments in the face of that marvelous publication by CEQ on desertification of the US by overgrazing. Where is the cumulative impacts of removing the acres from resource protection and increasing the mining?	Table 4-8 of the Draft EIS gave the acreage changes in each multiple-use class for habitat management plans affected, bighorn sheep, desert tortoise, and Mohave ground squirrel habitat. The overall trend is toward a less protective multiple-use class for the crucial habitat of these species. The impact of the change depends on the nature of the actions to be taken in the future. Although this is unpredicatable, it can be expected that some habitat degradation will result. The impact will be greatest in those areas changing from Class C to Class L due to the large difference in the respective class guidelines. The changes in livestock grazing will only slightly increase competition between bighorn sheep and cattle in the central Mojave. Forage for bighorn and other wildlife has been allocated directly or reserved indirectly through livestock exclusions for slope greater than 50%, for distance to water greater than 4 miles, and for poor range conditions (see response to NRDC comments on Amendment 14).
Judith Anderson (Also Natural Resources Defense Council)	There are a number of registered, designated and potential Natural Landmarks affected by the California Desert Plan and these amendments. These landmarks should be noted in this plan.	No designated or registered National Natural Landmarks (NNL) would be adversely affected by proposed plan amendments. The only NNL in an area being amended is the Imperial Sand Hills (Algodones Dunes) NNL, in the area affected by Amendment 26.
Naval Weapons Center	The FEIS/CDCA Plan states that a task of the CDCA Water Resources Program is "[t]he analysis of the impacts of various activities on water resources, including the collection of sufficient data to conduct adequate analysis and the formulating of recommendations for avoiding or mitigating impacts." In addition, the EIS/Plan discusses water quality impacts associated with mining, energy, ORV and grazing activities. However, the 1982 Plan Amendment DEIS, while proposing developments in all these areas, does not specifically discuss associated impacts to water resources. The FEIS should identify surface and groundwater resources in amendment areas, where they exist. The potential for impacts to these resources should be evaluated, and mitigation measures presented. Water quality impacts associated with mining, energy, ORV and grazing activities may result from chemical pollution, groundwater overdraft, soil compaction, erosion, alteration of drainage patterns, and bacterial contamination. Of particular concern are Amendment Nos. 6, 10, 12, 14, 18, 26, 51 and 52.	Potential impacts on water resources are recognized. The impacts from amendments allowing increased ORV use are expected to be insignificant. Increased water erosion may result from ephemeral runoff, but viable surface water supplies will not be affected. Significant impacts may result from amendments which would allow geothermal, agricultural and other developments. These impacts would be evaluated and appropriate mitigation measures developed as specific activity plans are developed.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
	AMENDMENT 1	
San Bernardino Planning Dept.	We suggest that BLM consider allowing such sites in Class L only if facilities are of such type to allow installation, operatoin and maintenance via helicopter service, eliminating the need for additional road building in Class L.	While a requirement for helicopter use can be addressed by the environmental assessment prepared for a proposal, we do not wish to make it a class guideline. If the environmental values of a particular site were such that use of a helicopter would be the only acceptable means of installation and maintenance, it could be required at that time.
	AMENDMENT 2	
Naval Weapons Center	The proposed change under "Leasable Minerals" appears to imply that under no circumstances would an Environmental Impact Statement (EIS) be prepared for a proposed lease in Class L through I. This issue should be clarified in the Final Amendment EIS because it is appropriate that an EIS be prepared when significant impacts will result from mineral development. From the military perspective security, land use, and airspace conflicts represent issues that may be signficant enough to require a full scale EIS evaluation. Mineral resources are fixed in location and thus in some cases no mitigation may be feasible. Therefore, an EIS evaluation would be the only means of complying with the NEPA.	While only an EA is noted as being required, this by no means implies that "under no circumstances would an...EIS be prepared." NEPA requires the preparation of an EIS whenever an action is proposed that would significantly affect the human environment. That requirement must be observed, whatever one's interpretation of a particular plan guideline might be. This is noted on page 12 of the CDCA plan.
Naval Weapons Center	Under Class L the specific environmental review requirements have been replaced with the more general statment "NEPA requirements will be met." It should be understood that, while environmental impact statements may not be specifically stipulated in every case, under NEPA these projects must still be evaluated on a case-by-case basis for significant impacts which would require preparation of an EIS. This is particularly important for sensitive Class L areas where mining and energy developments may impact desert air, water and other environmental quality factors.	While only an EA is noted as being required, this by no means implies that "under no circumstances would an...EIS be prepared." NEPA requires the preparation of an EIS whenever an action is proposed that would significantly affect the human environment. That requirement must be observed, whatever one's interpretation of a particular plan guideline might be. This is noted on page 12 of the CDCA plan.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
Naval Weapons Center	The proposed change under "Locatable Minerals" is not clear regarding the requirement for plans of operation. Are such plans required on all claims prior to claim development? Also, how are the environmental reviews publicized to the public for plans of operations so interested parties can participate in reviews? Without some form of notification it is very difficult for interested parties to even know a plan of operation is proposed, let alone to review it.	According to the current 3809 regulations (45 FR 78902 November 26, 1980), an approved plan of operations is required prior to beginning any operation that is not "casual use." Additionally, in the CDCA there is no minimum threshold of surficial disturbance for plan of operations requirement. Acreage disturbance could range from 0 to an unlimited number of acres. Currently, plans are advertised in the legal notices section of the local newspaper nearest to the operation's location. In two years of plan processing, very little public input has resulted.
Naval Weapons Center	Regarding access for mineral exploration and development, will the access routes be evaluated prior to field exploration, as part of a lease, or as part of a plan of operation? Or, alternatively, will all access to mineral claims and leases be evaluated under rights-of-way grants? If neither of the above approval procedures is used, does this change imply that access to a "mineral" site can be developed with no prior review? Such a decision needs to be clarified so interested parties can effectively participate before adverse impacts occur to resources of concern. If this amendment provides blanket approval for development of access routes, then the environmental documentation is wholly inadequate and requires extensive upgrading.	Access to energy leases (i.e., oil and gas and geothermal) is normally evaluated at the time a surface disturbing activity is proposed (i.e., drill test, etc.). Access rights are normally conveyed to the lessee subject to compliance with existing laws and regulations. Access to mining claims is guaranteed by the General Mining Laws. No separate permit other than the Plan of Operations is required for access. The change in phraseology of the guidelines in no way changes handling of this issue. The changes were made to more accurately reflect the rights and responsibilities of mining claimants and mineral lessees.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
	AMENDMENT 3	
Naval Weapons Center	Superior Dry Lake is redesignated from closed to "limited passage through the lake." Since this area borders the Center's South Mojave B Range boundary, it is essential that this change be properly controlled or rejected. The NAVWPNCEN and George Air Force Base should participate in any route selection process or vehicle user controls. How the BLM intends to enforce "limited passage" is very important. Since George's Weapons Delivery Range was transferred from Cuddeback to South Mojave B, it is recommended field signs and map designations indicate extremely low level jet aircraft passes will be made over the Superior Dry Lakes. This type of warning may prevent an accident by an unwary recreationist. Also, the boundary signs defining the Center's boundary must be completed prior to opening this area to "limited passage."	As proposed in the revised plan amendment, routes of travel in Class L areas would be designated as open, closed, or limited. Selected routes from this process (which BLM would like to encourage use on) would be shown as primary routes on resource area guide maps. These maps would be tied to signs in the field. The boundaries of the South Mojave B Range, along with other restricted areas, would be signed where appropriate to protect recreationists. Since the vehicle access designation process would rely on input from the public, you would be asked to participate in the process.
Naval Weapons Center	Of concern is the real consequence of allowing use of routes of travel in Class L areas before such routes are specifically opened. The Draft EIS discusses this procedurally but it contains little or no environmental impact analysis. The analysis in this document does not address how many routes will be affected; where such routes go from and to; what resources might be impacted along routes; or what resources lie at the end of such routes that might be impacted.	There will be no additional impacts caused by changing the procedure outlined in amendment 3 to allow use of existing routes of travel in Class L areas, because these routes are now open under the Interim Access Guides. There guides were directly served from the Interim Critical Management Plan (ICMP). Maps which allowed use on existing routes of travel established prior to November 1, 1973 until designated otherwise. There is no way to make an exact determination as to the number of routes affected, where the routes are, or what resources are affected until the inventory and route designation processes are completed. However, areas of known resource sensitivity were closed or limited to use in the ICMP process and in the Desert Plan. When the route designations begin, a careful evaluation will be made to ensure that routes are selected that minimize resource damage.
	AMENDMENT 4	
San Bernardino County Planning Department	"to provide for the protection and enhancement of surface and groundwater resources, except for instances of short-term degradation caused by wildlife and habitat enhancement projects." (Proposed addition is underlined)	A revised wording of the alternative has been included as Alternative C; see Table 1-1 .

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
	AMENDMENT 6	
Sierra Club	The DEIS fails adequately to consider cumulative impacts of a race occurring annually. The document repeatedly asserts that the course chosen utilizes areas of previous impact so as to reduce degradation (DEIS at 2-3 and 2-20). This approach ignores annual (and for many segments, more frequent) use of the course which will preclude efforts to mitigate impacts.	A section has been added describing cumulative impacts of an annual Barstow-to-Vegas race. (See Chapter 4)
Sierra Club	BLM has failed to address the fact that by authorizing an annual race such as Barstow-to-Vegas, other recreational uses are being foreclosed as a result of the unmitigable degradation of the plant, soil and wildlife community.	While the proposed course is used for events, notably an annual Barstow-to-Vegas race, the BLM realizes that natural rejuvenation will be set back until such activity ceases. A decision to allow such use to occur would recognize that resources will be damaged by racing. Cumulative impacts will occur, but not, we think, above levels described in Chapter 4 of the DEIS. An annual large scale race (one of the very few allowed in the CDCA) would foreclose for one day a year many other recreational activities that might have occured along the proposed route; nevertheless, the opportunity for these other activities will be widely available over large areas of the desert.
Sierra Club	In the DEIS BLM fails to discuss why mitigation measures found inadequate in 1974 will now work for an event of such magnitude. Substantial documentation exists to show that mitigation might, in fact, be impossible.	The main step taken to mitigate a possible 1983 Barstow-to-Vegas race, as compared to the 1974 event, is reduction in numbers of participants from over 3,000 to under 1200. Also, the 1974 race allowed two starting waves of over 1500, while the 1983 race would allow only 400 in each wave. Mitigation measures attempted in 1974 perhaps would have been far more effective if numbers had been limited to 1200 or less. A key element of the Decision Record for this amendment will be the determination of acceptable use limits of the proposed course.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
Committee for Green Foothills	In addition to the interest shown by the motorcycle racing community, it was well-known to BLM that there were equally (at least) strong feelings of public antipathy to the place and manner in which BLM stages this type of motorcycle event, especially as the Barstow to Vegas race is, properly, associated in the public's mind with senseless destruction. Thus, by working "... closely with the American Motorcyclists Association (AMA) to determine what course would be considered in this EIS" (. 2-19), BLM deliberately excluded other interested parties from the planning process, and thereby reduced to zero any possibility of getting any public acceptance of this privately worked out deal.	As part of BLM's scoping effort for Amendment 6, southern California environmental groups and locally affected Indian Tribes, ranchers and miners were contacted by phone or letter for preliminary comment while the amendment was being prepared. The proposed route was also shown and discussed with members of desert-oriented conservation groups to determine what issues should be addressed in the DEIS.
Committee for Green Foothills	As bad as the pitting operations for the Johnson Valley-Parker race really are, they will not be comparable to what is invited by the present proposal: (1) In the Johnson Valley-Parker races, no spectators were "permitted" at the pits; the Barstow-Las Vegas race permits this. (2) Only 360 racers participated in the legal 1981 Johnson Valley-Parker race, and only 289 survived to a point midway between pits 2 and 3; this EIS calls for 1,200 participants. If damage is only directly proportional to number of participants, the 8 acres alloted to pits for the Barstow-Las Vegas race will be overrun by 10 to 22 acres.	As the number of participants in these events increase, it appears from casual surveys of Johnson Valley-Parker races that the ratio of participants to pit vehicles increase. The sponsor was consulted on the issue of pits and felt that the 8 acre limit was reasonable and feasible.
Committee for Green Foothills	Clearly, if BLM really chooses to use the experience gained from "similar events", it must increase its estimates of the area of adverse influence on the order of 500%. In fact, it is worse, because the proposal calls for an incarease of 33.3% in authorized use compared to the Johnson Valley-Parker race, and if 1200 racers actually participate, a real increase of 233%. Accordingly, the experience derived from "similar events" which are less permissive than the proposed event, indicates that BLM's estimates of the area of influence of the proposed event are wholly unrealistic.	It is assumed in this comment that the width of the course would be directly proportional to the number of participants, at lease in cross country segments of race courses. The Johnson Valley-Parker course, after three years of use, shows an average cross country width of heavy use less than 30 feet wide, and moderate or light use from a few feet to 20 feet beyond that. The areas where widths have been greater than 50 feet are isolated and tend to be for very short distances. Past Barstow-to-Vegas races, even with 3,000 entrants, stayed within a 100 foot area over most cross country segments.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
Committee for Green Foothills	Separation of routes in "washes" from cross-country routes can only seem as a deliberate effort to reduce the apparent cross-country milage proposed. Separation of cross-country routing on new courses is similar obfuscation because cross-country motorcycle race courses are not like roads--each new wave or race cuts new trails in braided networks, especially where obvious physical signs of previous use are less noticeable.	The proposed routes were differentiated into roads, washes and cross country segments previously used or not used. This differentiation was useful in determining levels of new impacts, and was not intended to obscure what the course really is.
Yuma Audubon Society	BLM should issue use permits only on an annual basis, rather than a multiple-year basis as proposed (EIS, p.2-24). A monitoring plan should be implemented to assess impacts after each race and quantitive criteria for discontinuance of the use of the race course should be set. With only single-year permits available, permission could be withdrawn more rapidly if necessary to respond to unacceptable levels of environmental degradation.	Multiple year permits allow BLM and other agencies to reduce costs. Annual monitoring will still take place, and the permit may be revoked at any time if necessary. Criteria for rejection of a permit request or discontinuance of a multi year permit would be based on the following general criteria: 1) Stipulation required in advance of a permit were not met (private owner permission, insurance, etc.) 2) Nonpayment of permit fee. 3) A clear inability to control a race, adhere to the stipulations or follow through on post race mitigation that may be required.
Yuma Aududon Society	A conservation fund should be established from the race entry fee to mitigate environmental impacts. Under the present proposal, cyclists reap nearly all the benefits but do not pay much of the cost. If people want to, in effect, consume public resources, such as plants, animals, the soil, and air, they should pay proportionately.	At the present time fees collected from Special Recreation Use Permits go to the Land and Water Conservation Fund. BLM will be instituting new policies for cost recovery; the statement on fees in the Draft EIS (page 2-24) has been rewritten to reflect new regulations (see Chapter 4). All costs of issuing and monitoring a permit will be paid by the sponsor.
Yuma Aududon Society	The permit/use guidelines state that "The sponsor will discourage participants from collecting or disturbing wildlife, livestock, cultural artifacts and vegetation" (EIS, p. 2-26). This should be changed to require the sponsor to provide all necessary enforcement to prohibit these activities, and if they do not already exist, establish penalties for molestation of natural or cultural resources beyond that permitted by the race regulations.	Stipulation 14, page 2-26 DEIS already requires the sponsor to provide law enforcement services at selected high use areas of the course. State and federal regulations already prohibit molestation of wildlife, livestock, cultural resources and vegetation. This particular stipulation (#12) is intended to have the sponsor inform participants of regulations and presence of resources so that inadvertent damage is minimized.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
San Bernardino County Planning Department	Policy requires the applicant to pay for or the BLM to provide County an environmental assessment adequate for the County's review of the impacts on private lands, mining operations, etc., pursuant to the California Environmental Quality Act. This EIS on this Plan Amendment is not adequate for that purpose.	If Amendment 6 is approved, steps will be taken by BLM and the sponsor to meet the additional requirements of an EIR for State and County needs.
State of California Resources Agency	The State has particular concern with the proposed use of State lands through which the race course would pass. The permit/use guidelines established for the race do not specifically acknowledge the requirements of the California Environmental Quality Act; and as noted in the 1982 Draft EIS, prior to any State approval an EIR must be prepared for the project having potential for significant environmental impacts. Because these requirements are different than those of Federal law, if this amendment is approved, sponsors of the race should be made aware of these differences as soon as possible. Approval of this amendment would require consultation and cooperation between the BLM and the State Lands Commission for land use decisions.	
Natural Resources Defense Council	Changes in the race course should be required to be considered as an amendment to the CDCA Plan, not just major changes (EIS, p. 2-21).	Minor changes might have to be made in the course to avoid new developments or to reduce impacts. Generally these changes are less than one or two miles and involve non-sensitive areas. Since an environmental assessment will be prepared for each permitted event, an adequate level of analysis can be achieved without a Plan Amendment, allowing changes to be made quickly. A desirable course change might be delayed for up to one year if a Plan Amendment were required. Please note that large course changes, or changes that may raise sensitive issues would be made through the Plan Amendment process.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
Sierra Club (Also Yuma Audubon)	The 1982 DEIS fails to discuss a range of alternatives to the proposed action. The options it does discuss are not alternatives to the suggested course but are supplemental courses to be designated as part of the established Barstow-to-Vegas course... ...it is obvious that there is a broad panoply of alternatives that ought to have been considered. For example, another course on another part of the desert ought to have been considered. It is by no means obvious why portions of the competitive event courses already designated in the desert could not be used. Other courses, some perhaps in less sensitive parts of the desert closer to urban centers, could have been considered, including shorter loop courses in areas of the desert already designated open to off-road vehicle free play... ..., the Draft EIS states that Pit 2 as well as the portion of the course leading up to and away from it passes directly through a Unique Plant Assemblage of shadescale scrub. The Draft explains that the use of Alternative Pit 2 would greatly reduce this impact, yet it fails to include the use of Alternative Pit 2, precluding any use of Pit 2, as an alternative to the proposed action.	A new course alternative has been added in the Clark Mountain area (See Chapter 4 for a description and analysis of Option 5). Another course option south of the Clark Mountains was also considered but study will be deferred pending decisions reached on Amendment 6 and completion of IPP transmission line through the area in question. The five course options now under consideration were intended to serve two purposes -- provide variety for users year to year, and to offer alternative routes for environmental mitigation. Alternative pit 2 was developed by BLM as a possible means of mitigating impact to cultural and botanical resources found in the vicinity of the originally proposed pit 2. If required, only one site will be approved for use. Wording in the Proposed Action has been changed to reflect this intent for the course and pit options (See Chapter 4). A course beginning in an Open Area and making use of existing designated courses was considered early in the planning process. However, there is little demand for another course in any area other than the Barstow-to-Vegas corridor. It was hoped that approval of the Johnson Valley-to-Parker route in 1980 would satisfy demand for a Barstow-Vegas route, but the two races are quite distinctive in the mind of the racing community. The Johnson Valley to Parker race was not considered a substitute for a Barstow-to-Vegas event.
Sierra Club (Also Yuma Audubon Society, Committee for Green Foothills)	BLM seem to concede the inevitability of the protest race and fails to consider the resources and costs involved in preventing the protest from occurring as opposed to the costs of controlling and mitigating an authorized race. Its analysis of the no-action alternative is therefore biased and its perfunctory consideration fails to inform the reader of its comparatively beneficial effect on the environment relative to the proposed action.	These protest rides have been rallying points for many in the motorcycle-riding community and likely would continue elsewhere if strict controls were put on the event as it now exists, merely displacing the problem. In previous years BLM has taken steps to curtail and/or control this particular activity, with moderate success. The protest rides are monitored by BLM; over the past two years, observations indicate that the rides do not meet the criteria used to determine if a permit is required: 50 or more vehicles, commercial use, competitive use, or special area use. The protest rides generally involve discrete groups of less than 50, with no indication of commercial use and little if any indication of an organized, competitive race.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
San Bernardino County Planning Department (Also Sierra Club)	We are willing to work with BLM staff and AMA to establish a "trail ride" or "enduro" course, utilizing recognized roads and trails, as an alternative to a race course (a substantial portion of which is "cross country"), as a means of instituting a use compatible with the unique resources, private parcels, and mining activity occurring within the corridor.	The proposed action makes note of the possibility that other types of events may make use of the course, and wording has been added to make this more clear (see Chapter 4). It is recognized by BLM that a hare and hound, mass start race would be the 'worst case' use of the proposed course.
Sierra Club	BLM's discussion of cultural resources in general is lacking. Though the Draft Report of the Environmental Assessment Division on the 1974 Barstow-Las Vegas Motorcycle Race Impacts discloses that the 1974 race resulted in significant damage to archaeological and historical sites on and near the course and recognized the high value of on-site resources and the lack of adequate inventory of resources potentially affected, BLM does not seek to remedy this situation in its 1982 DEIS. Though it admits that segments of the race course are rich in archaeological and historical resources, the EIS makes no mention of the measures it might pursue to protect these resources. Such a cursory dismissal of race impacts on cultural resources is clearly erroneous.	Additional mitigation measures have been added to Table 4-1 of the DEIS. Table 4-9 has been revised to conform to Table 4-1; collection should have been recommended for six sites listed on page 4-102 of the DEIS. Additional information on direct and indirect impacts have been added to the analysis of impacts to cultural resources. Please see Chapter 4 for these additions/corrections.
Committee for Green Foothills	Washes are not simple systems that can be lumped as BLM has attempted for purposes of assessing impacts, especially considering that several orders of drainages are used by the proposed course. The soils impact analysis applies strictly only to the active wash deposits that are frequently flooded; these generally constitute only a small percentage of wash deposits. Remaining deposits include materials that are flooded only very infrequently (on intervals of a thousand years or more) and have incipient soil horizon development. Such soils, likely more than 2000 years old, are highly vulnerable to disruption by motorcycles. They also support different vegetation than the active washes.	Virtually all of the course identified as washes occurs in active washes. The conclusion that accelerated erosion in washes due to racing would be much less than the amounts of material which would be transported during flash floods by washes in an undisturbed condition is very relevant. It indicated that the effect of racing on erosion in washes will be minimal in most areas in comparison to natural processes.

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Commentor	Comment	Response
State of California Resources Agency	The Barstow-to-Las Vegas race would cause severe, long lasting damage to soils along the course. While the 1982 Draft EIS attempts to downplay the impacts on soils, the State's evaluation of the race proposal revealed that the 1982 Draft EIS fails to adequately consider the race's impacts on soils. The State found several statements in the 1982 Draft EIS discussion of the race proposal that merited further analysis. These include statements that in the starting cone and camp areas, loosened soil would be susceptible to wind erosion until rain establishes a "crust" (pp 4-9); that the first 6 miles of the race is run in a wide wash system which is capable of being easily reclaimed (pp 4-23); and that if the race is not allowed, riders would be uncontrolled and stray into more sensitive areas (pp 4-25). The discussion relied on a generalization about the particle size distribution of desert soils that cover a very large area. However, unless examined in detail, there is no certainty that all of the soils would have a large coarse fragment. According to the CDCA Plan Draft EIS, February 1980, "all soils, except cohesionless sand and some playa sands, are more susceptible to wind erosion after wind disturbance by motor vehicles (pp 134). In addition, "on gentle slopes (as low as 3 percent), long compacted trails show significant erosion rates. Although riverwashes with coarse sand resist compaction, sloping banks and escarpments along the riverwashes are highly suseptible to erosion when vegetation is disturbed." The current discussion fails to identify how spectors will be kept in the riverwash area, or away from banks and vegetation on these sensitive areas. The 1980 Draft EIS acknowledges that when vegetation is disturbed on stabilized windblown sand area, sand will migrate (pp 185). Other previous statements by the BLM are also pertinent to consideration of the race proposal. According to the 1980 Draft EIS, the desert soil surface has a vesicular crust from wetting and drying cycles and a layer of well-sorted pebbles and cobbles which constitute the desert pavement. The underlying soil is highly susceptible to both wind and water erosion. The vesicular crust may	The 1982 Draft EIS does not attempt to downplay the impacts on soils. Soil compaction was predicted which may significantly reduce productivity of vegetation, particularly after many years of racing. As long as races are being held an even longer impact on vegetation would result from plants being run over. Much of the accelerated erosion resulting from racing would occur on areas where productivity has already been severely reduced by direct damage to vegetation from vehicles and by soil compaction. The amount of accelerated erosion due to racing would be small in comparision to natural erosion which occurs during events such as flash floods. Evidence of tracks does not tend to be long lasting in washes. If washes become flooded during conditions such as flash floods, vegetation on banks may do little to reduce erosion, whether a race has been held in the wash or not. The erosion noted on gentle slopes (as low as 3 percent) occurred under special conditions, where long straight compacted trails conducted runoff water from a very large, denuded, intensely compacted pit area. Field examinations of soil in the starting cone and camp areas show clearly that crusts will reform in these areas after rain. The Draft EIS never claimed that all of the coarse would would contain coarse soil particles. However, much of course does have a substantial amount of coarse material. This will restrict further erosion after loss of some soil leaves behind a surface layer with many non-erodible particles. The greatest potential for accelerated wind erosion would occur in areas with long erosion patches, such as pit areas, the starting cone, and dirt roads. The course does not have well-developed top soil so loss of some surface soil may not lower potential for productivity. The direct impacts to vegetation and the soil compaction in pit areas, the start cone, and dirt roads which would result from years of racing would cause a large reduction in productivity of these areas. Additional concern about effects on productivity caused by wind erosion from these areas does not seem reasonable. The comment that desert soil has "a layer of well-worted pebbles and cobbles which constitute the desert pavement" is not a good generalization. Desert pavement is formed only in some desert locations and well-developed desert pavement is not found along the race course. The Draft EIS did not state that if the race is not allowed, riders would be uncontrolled and stray into more sensitive areas of soil. The statement on p. 45 concluded that not allowing the race would allow a

TABLE 3-1
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Commentor	Comment	Response
	reform after a wet/dry cycle, but the desert pavement, once disturbed, takes many years to reform (pp 185). The 1980 Draft EIS also states that the loss of soil is directly proportional to the width of continuous disturbed area, called the erosion fetch (pp 134). Erosion hazards are, therefore, great in pit areas, the starting cone, and on dirt roads. We note that the discussion of the race proposal states that BLM bulk density samples along the 1975 Barstow-to-Las Vegas race course showed increased compaction in 2/3 of the samples (pp 4-8). Greater compaction occurs in camping areas, pit areas, and most of the length of previously used cross-country segments. Finally, according to the 1980 Draft EIS Summary of Impact on Vegetation (from the 1974 race), random driving of vehicles is generally far less destructive on an area-wide basis than organized and repeated driving on established courses. The 1982 Draft EIS examines the race's impact on sensitive plant species and unusual plant assemblages. While the 1982 Draft EIS assesses damages to these plant species (many were not identified as existing on the race course) to often be minimal, it does not adequately consider the damages that would occur to species existing on or directly adjacent to the courses and pit areas. The race would often cause complete destruction to these plant assemblages, and the erosion resulting from the race would cause long-term or permanent damage to course and surrounding area plant habitat. Table 4-2 of the Draft EIS estimates that there would be a 70-75 percent "Moderate to High" impact on vegetation in the camping and start cone areas, and two pit areas 100 percent "Moderate to High" impact on the Bomb to Mile 6 area, and other significantly high impacts in other areas along the course.	greater chance of free play and previously undistrubed areas may be impacted.

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Commentor	Comment	Response
Committee for Green Foothills	The analysis of soil impacts is further deficient in not recognizing many occurences of eolian soils throughout the western half of the proposed route, and the effect of destroying their plant cover. Qualitative statements (p. 4-8) that "much larger" numbers of motorcycle passes (than 5) on dry soil would be required to cause significant reduction in growth of annuals are not compared with the number of passes than might reasonable be expected from one running of a 1,200 motorcycle race, from 2 runnings, from 3, etc. In other words, the way BLM states the problem obscures the likelihood that compaction thresholds will be exceeded and that significant damage will be caused. The analysis ignores altogether the effects of cumulative impacts.	Some eolian deposits occur along the course, although these do not constitute a major portion of the course. Some shifting of sand off the course may occur as a result of the race but this does not appear to be a major impact.
Committee for Green Foothills	The soils analysis further fails to recognize thresholds in effects of large rock fragments on accelerating or stabilizing erosion rates, and provides no quantitative data to support any position, but nevertheless takes the usual BLM position that nothing bad will happen. The amount of accelerated erosion compared to amounts of sediment normally carried in washes is irrelevant; the regulations do not stipulate that an amount of country may be torn up that would yield some arbitrary percentage of the natural sediment yields. Rather, they require the impacts to be minimized.	The soils analysis does not take the position that "nothing bad will happen" . The predicted soil compaction, especially after many years of racing, can greatly reduce productivity of vegetation in the more heavily impacted areas. Of course, if racing continues, productivity will be reduced to a greater extent by vehicles running over vegetation on these areas than by soil compaction. The statement about numbers of motorcycle passes which may cause significant reduction in subsequent annual growth was not meant to imply this threshold would not be exceeded in heavily tracked areas but rather implies that a single pass, such as may result from a motorcycle straying from the main course, will probably not produce significant compaction. Increasing amounts of large rock fragments reduce potential for erosion but there are no "threshold" quantitative values at which stabilization or acceleration of erosion suddenly occurs unless reference is being made to rock outcrops compared to soil. Because of the scale of mapping not every small exception to the type of terrain crossed can be shown on the map.

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Commentor	Comment	Response
Committee for Green Foothills	The estimated vegetation impacts (Table 4-2) provide adequate reason for rejecting this amendment by themselves. Estimated impact levels of "substantial and essentially permanent reduction in the abundance of a species" to "a severe threat to the viability of a species of population" in 70-75% of the camp area, 70-75% of the start cone, 100% of the route from the bomb to Mile 6, 67-77% of all options from Mile 6 to Pit 1, 45% of the route from Pit 1 to Pit 2, and 0-79%, all options, from Pit 3, hardly support the notion that the proposed route was selected with care, and clearly indicates that the selected route violates requirements of CFR 8342 that these damages be minimized.	Mr. Wilshire quotes the impact rating categories for sensitive plants and Unique Plant Assemblages (UPAs; p. 4-14) in his discussion of vegetation impacts in Table 4-2 (p. 4-17). As noted in the table, very specific definitions were used in assigning impact ratings to habitat types along the course and they were not the impact level definitions quoted by Mr. Wilshire in his comments. Also, these comments seem to assume that the BLM has assigned a high impact rating to the majority of the sections of the course. As stated in Table 4-2, the impact levels are estimates and in most cases a range of estimates were given. Moderate to high impact levles were assigned to those sections of the course where sufficient data on susceptibility to disruption through soil compaction was not known along the individual portions of each race section. Hence, some areas along these sections will receive moderate impacts, while others will receive high impacts, depending on their susceptibility to disruption/compaction.
State of California Resources Agency	The 1982 Draft EIS examines the race's impact on sensitive plant species and unusual plant assemblages. While the 1982 Draft EIS assesses damages to these plant species (many were not identified as existing on the race course) to often be minimal, it does not adequately consider the damages that would occur to species existing on or directly adjacent to the courses and pit areas. The race would often cause complete destruction to these plant assemblages, and the erosion resulting from the race would cause long-term or permanent damage to course and surrounding area plant habitat. Table 4-2 of the Draft EIS estimates that there would be a 70-75 percent "Moderate to High" impact on vegetation in the camping and start cone areas, and two pit areas, 100 percent "Moderate to High" impact on the Bomb to Mile 6 area, and other significantly high impacts in other areas along the course.	As noted in Chapter 3 (p. 3-16), all locations of sensitive plants and UPAs along or in the vicinity of the course were examined in the field. Immediate topography and soil properties were important considerations in assigning our potential impact rating. Topography provides protection for many of the sensitive botanical resources as we mentioned in our text (p. 4-14 to 4-16). We feel that our impact analysis adequately addresses the potential concerns that you have raised and that there will be little, if any adverse impacts to sensitive botanical resources.

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Commentor	Comment	Response
Committee for Green Foothills and Sierra Club	The account of anticipated impacts on wildlife does not reference the 1976 follow-up study on small mammals conducted by BLM on the 1974 Barstow-Las Vegas course, which found that Populations (sic) densities of certain mammals were found to be as much as eight times greater in control areas (than in the 1974 Barstow-Las Vegas race area) indicating a significant change in habitat quality as a result of this type of ORV activity. The restriction of discussion of wildlife impacts (Table 4-2) to the desert tortoise, bighorn sheep, mojave fringe-toed lizard plus raptors and one specialized habitat is entirely unwarranted and ignores the systematic relations among all species and all habitats, whether BLM considers them important or not. Nonetheless the figures listed in Table 4-3, indicating moderate to high impacts to the species considered in as much as 100% of particular course segments involving large areas of land (e.g., start cone, 1600 acres, 100% moderate impact on desert tortoise), indicate the unacceptability of the proposed event. The mitigation discussion in the EIS also fails to mention documented impacts on the small mammal population, which provide "further evidence that ORV activity causes a reduction in productivity and habitat quality of desert ecosystem." (IMpacts of Barstow-Las Vegas Motorcycle Race on Wildlife Habitat, Hicks, Sanders and Cooperider (June 30, 1976) at 13.)...Mitigation of such impacts, if possible to achieve, must be addressed in the DEIS especially since "(a)ny further reduction of animals and/or limited habitat could put the population in a a downward trend from which it might not recover. Id at VII-1. BLM offers no specific mitigation for the impacts it forsees in the 1982 DEIS on the bighorn sheep, desert tortoise, raptor and lizard populations in the desert,...	The 1974 EIS addressed a much different event than the one presently proposed. The old races were basically uncontrolled free-for-alls compared to the presently proposed event which is much more strongly controlled. The old races very likely did result in 90 percent reductions in small mammal populations in specific areas (i.e., start-finish, pit, and spectator areas). Such areas, where 50 to 100 percent of the vegetation was lost, would indeed experience such losses in wildlife numbers. However, this does not mean that the animal population, as a whole, is reduced to the point of possibly never recovering. An animal population exists and reproduces in suitable habitat throughout its local range. In other words, if a kangaroo rat on deer mouse population is homogeneously distributed throughout a valley 100,000 acres in area, of which virtually all is suitable habitat, and 1000 acres are destroyed in that valley (from a motorcycle race star), then approximately one percent of the rodent population throughout that valley has been theoretically lost. This does not decimate that rodent population nor is it even threatened. What it means is that the one percent of the population (and habitat), in the 1000 acres that were impacted by the race start, effectively has been lost to the overall population in the valley. This 1000 acres is functionally lost as viable habitat to that rodent population and likely will not recover for many years. It is true that small mammal populations - or lizard populations, or snakes, or songbirds - were not specifically addressed in the DEIS. However, an overall assessment of wildlife habitat impacts was made in the DEIS and from this impacts to these populations may be inferred directly. Further, the DEIS referenced the 1974 DEIS. It is currently Bureau policy to address only significant resources in environmental documents. Significant wildlife resources include federally listed endangered on threatened species and/or their habitats, state listed endangered or rare species, BLM sensitive species, or any other species or habitats which are considered biologically significant or important. Since it is these components of the resource which constitute the issue, it is only these most important resource components which are discussed in an environmental assessment - just the most important facts so that management has a consise yet accurate picture of the effects of a proposed action. As a result, the DEIS centered its wildlife assessment primarily on bighron sheep, desert tortoise, and raptors. Mitigation for these wildlife resources, contrary to the SCLDF letter, is incorporated into the DEIS in the form of race rules and stipulations. The information as to what wildlife resources would be affected, how they would affected, what the consequences would be, and partial mitigation of those effects is offered in the DEIS.

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Commentor	Comment	Response
Sierra Club	The Bureau's regulations implementing E.O. 1644 provide that "areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats."....Certainly, the effects described from course designation are more than minimal and warrant disapproval of Amendment 6.	The regulations are correctly stated above in that BLM shall minimize conflicts between uses and harassment of wildlife and other resources. This wording does not necessarily mean impacts must be mimimal, although the BLM attempts where feasible to meet that goal. Efforts were made to mimimize harassment of wildlife by avoiding known sensitive habitat, or proposing course options that would avoid them.
State of California Resources Agency	The State believes that allowing of the race course through wilderness areas violates the Interior Management Policy and Guidelines for Lands under Wilderness Review (IMP: BLM 1979). The IMP allowed organized ORV events to pass through WSA on existing ways and trails so long as it has been determined that such uses satisfy non-impairment criteria. The race would affect several WSAs, passing through WSA 242 and 225 and along the boundaries of WSA 228, 222 and 227. The 1982 Draft EIS states that the non-impairment criteria would be met because the race would have a temporary impact on the WSAs, and the impacts of the race would be substantially unnoticeable. The State disagrees with this analysis. First, the EIS states that the effects of the race "would be temporary" (1982 Draft EIS pp 4-23), yet evidence indicates that this would not be the case. ORV use in desert areas has been shown to cause long-term or permanent damage to soils and habitat. Tracks from ORVs have been known to persist for years. Impacts from the race would be anything but temporary and would seriously damage the wilderness and scenic resources of these WSAs.	The first of three nonimpairment criteria state that, "(The activity) is temporary." Impacts themselves need not be temporary, but must not be "substantially noticeable in the area as a whole..." (USDI 1979, page 18).

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Commentor	Comment	Response
State of California Resources Agency (Also Committee for Green Foothills and Sierra Club)	Second, the IMP mandates that any impacts caused by the activity "be capable of being reclaimed to a condition being substantially unnoticeable in the wilderness study area as a whole by the time the Secretary of the Interior is scheduled to send his recommendations on that area to the President" (1982 Draft EIS pp 4-23). There is considerable question if reclamation attempts would be effective on desert soils and habitat. The 1982 Draft EIS assessment states that even without reclamation, the disturbances from the race would be substantially unnoticeable. BLM underestimates the environmental impacts of the race, and it seem unlikely that the desert habitat will be able to respond quickly from the damages caused by the race.	A section on reclamation of wilderness study areas has been added to the wilderness impact analysis (Chapter 4).
Yuma Audubon Society	The proposed course would impact several Wilderness Study Areas. There is a contradiction here. On p. 4-23 of the Draft EIS we are assured that organized ORV events will be restricted to "existing ways and trails." Yet on p. 3-27 we have already read that in WSA 225 and WSA 242 the proposed route would occur on "old" motorcycle routes where "past" use occurred and where "natural rehabilitation" is obliterating the evidence of past use. This sounds like anything but "existing ways and trails."	Page 4-23 of the DEIS refers to use of existing routes of travel, then goes on to state, "If the BLM determines that a race can and will be carefully controlled to ensure that it fully satisfies the non-impairment criteria, the use of cross country segments may be approved." (From USDI, 1979, page 17). The routes in WSA 242 and 225 chosen for study show signs of previous vehicle use ranging from heavy to light.
Sierra Club	The course traverses WSA 242 cross-country for two miles and across WSA 225, cross-country for 6 1/2 miles. Though there are signs of past unorganzied motorcycle use of this area, BLM fails to assess the cumulative impacts on wilderness qualities of a yearly Barstow-to-Vegas race as well as numerous shorter races to utilize the course as is proposed.	The wilderness analysis in Chapter 4 of the DEIS (4-23,24) assumed there would be an annual race. The two options referred to (option 1 in WSA 242; option 2 in WSA 225) were not considered for 'main course' designation because of their WSA status--the intent was to allow their use, if at all, on a limited basis. Wording has been added to Permit/Use Guideline #3 to limit use of these options. The issue of cumulative impacts of an annual event, specifically on areas under wilderness review, has been added to our assessment of impacts. Please see Chapter 4 for these additions.

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Sierra Club	The EIS does not consider the impacts on wilderness of a Barstow-to-Vegas race run in the rain, yet the 1974 EIS stated that "motorcycle tracks and ruts across wet playa would be expected to be visible for thirty or more years" and wheel tracks made in the early 30's in Soda Lake are still visible today. 1974 FEIS at III-2.	Option 1 crosses a small playa while following the border of WSA 242 (Map 2, DEIS incorrectly shows the boundary through section 34, T. 12 N., R 5 E.; the boundary actually follows the proposed course of option 1 through this section). However, a haul route is used by the course at this particular crossing, minimizing the chance of new impacts if the playa were wet. Concerning the more general issue raised of extra, possibly impairing impacts occuring on a wet course: wetness would increase the chance of damage to soils from extra compaction and rutting from vehicle use, making reclamation more difficult. Use of washes would tend not to create any damage above that caused by natural wash erosion. Option 1 and the first four miles of option 2 would sustain the worst damage when wet; it is therefore recommended that they not be used immediately after or during a rainstorm.
	AMENDMENT 7	
Yuma Audubon	If adverse effects are going to occur to cultural resources, the area must be surveyed and National Register eligibility determined for the the sites. The EIS does not state whether this has been done. Any sites eligible for inclusion in the National Register must either be protected or mitigation must be provided if they are to be destroyed.	Before this plan amendment is implemented appropriate inventory will be carried out. If any sites present are determined to be eligible for the National Register, appropriate mitigation measures will be taken. If some areas here are already seriously disturbed by unauthorized activities, a a full Class III inventory may not be required. Instead, A Class II (sample) inventory or judgemental inventory of areas likely to contain archaeological materials may be more appropriate.
Desert Tortoise Council	Contrary to the 1982 Desert Plan Amendment EIS (page 4-26) the ponds at Fort Soda are not fenced.	The ponds at Fort Soda are not fenced, but rather the roads entering the area from the north and the south are gated. Thus overall access to the area is controlled.

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Commentor	Comment	Response
San Bernardino County Planning Department	If Alternative A is accepted (western portion changed from M to I), before formal adoption, BLM should consult with the County Planning Department to determine whether or not it will be necessary to formally authorize "open" ORV use of all private lands and fee-owned easements within the new "open" area. We might require, as part of our application review, a listing of all private parcels, written statements from landowners allowing such use on their property, and an environmental inventory and analysis of the worst-case impacts that will likely result from such use of these private parcels. Adequate signing "closing" private lands within the open area to ORV use might eliminate the need for any County approvals.	The designation of an area as open relates only to BLM administered lands. Private lands are not designated in the process. In areas where trespass onto private parcels is a chronic problem, signing will be necessary to inform the recreationist of the boundary.
San Bernardino County Planning Department	The EIS doesn't indicate why this particular locality is necessary for "free play" use. The existing M designation would allow pit stops and use of existing roads and trails, all seemingly sufficient for any ORV uses in this relatively remote area.	The present boundary is not manageable because it splits many of the traditional use areas and it provides an insufficient area for free play and competitive events. The revised boundary corresponds with actual on-the-ground use in that region and is defined by topographic features. Expansion of the area would allow for a multitude of activities without compromising opportunities for non-ORV related activities.
	AMENDMENT 8	
Naval Weapons Center	See comments on Amendment 3 above regarding Superior Dry Lake. In the Final EIS the BLM should specifically address how it selectively intends to manage vehicle use on the Superior Dry Lakes. As an alternative to "limited passage" would it be possible to establish a land sailing staging area at one location and perhaps prevent uncontrolled vehicle use on the dry lake beds themselves? Please discuss this alternative in the Final EIS since it could also reduce overall impact to resources on and adjacent to the lake beds.	The amendments table (Table 1-1) has been modified to clarify this point. The selection of routes of travel or the Superior Dry Lakes will be handled through the Vehicle Designation Process which is defined in Plan Amendment 3. It is possible that when this selection takes place that a staging area could accommodate the use. Regardless of whether the decision is made to provide one area or a series of roads, vehicle use will not be uncontrolled. Route selection will be made in order to minimize damage to resources.

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Commentor	Comment	Response
	GENERAL GRAZING COMMENTS (AMENDMENTS 9 to 14)	
Natural Resources Defense Council	Moreover, the draft EIS ignores actual provisions of the Desert Plan that were designed to afford affirmative protection to bighorn sheep and other resources of the area. For example, the DEIS never even mentions the Desert Plan requirement that "the continued existence of (California bighorns) will not be jeopardized by Bureau acions." The California Desert Conservation Area Plan (1980), p. 30 (emphasis added) (hereinafter "Plan"). Nor does the DEIS measure any of the proposed amendments that concededly would negatively affect those animals against this and other protective provisions of the Plan. For example, the DEIS fails to analyze the degree to which recommended proposals for grazing will affect bighorn sheep within either the specific allotments involved or on a Desertwide basis. The draft never acknowledges or assesses the risk that some of the herds involved will be wiped out by adoption of one or more of the proposed amendments. Cf. App. XIII, p. 44.	No bighorn herd will be placed in jeopardy. The only permanent bighorn range within a proposed grazing allotment change is the Cady Mountain range. This herd of about 25 is to have a habitat management plan developed. This plan will provide for livestock/bighorn separation, bighorn water development, and other measures required to maintain a viable herd. No forage was allocated for livestock over most of the Cady Mountains due to slope, distance to water, and range condition (see also response to NRDC comment on amendment 14). Other ranges affected by allotment changes are only transient range with no regular bighorn use.
Natural Resources Defense Council	The draft ignores the possibility of making forage allocations for wildlife in two of the three allotments that would be reclassified ephemeral/perennial from ephemeral. See, e.g., id. p. 2-5. Nor does it consider restricting the timing of livestock use in order to avoid or minimize direct competition for space between livestock and bighorns.	No direct allocation was required for bighorn sheep in the Cronese Allotment for the following reasons. The allotment overlaps only a small portion of bighorn range in the Soda Mountains. This range is only transient and not permanent range or even seasonal range. No forage was allocated for livestock in the Soda Mountains due to the greater than 50% slope exclusion. No direct allocation was required for bighorn sheep in the Granite Mountains Allotment enlargement for similar reasons. The expansion covers a large portion of the Bristol Mountains, but this provides only very poor, transient range for bighorn. No forage was allocated for livestock over most of the Bristol Mountains due to the greater than 50% slope exclusion and the greater than 4 miles to water exclusion. This directly reserves that forage for wildlife (see also response to NRDC Amendment 14 comment). With water development, some of this may be open to grazing. In this area, the additional water available to wildlife may be of net benefit.

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Commentor	Comment	Response
Natural Resources Defense Council	The impacts of adopting any of the proposed amendments to the Desert's soils and vegetation are never addressed. Thus, for example, although applicable studies show that grazing causes a net increase in run-off[3/] leading to increased erosion and compaction in concentration in other areas,[4/] the EIS makes no attempt to determine the soil and erosion impacts of the proposed changes -- not even in areas such as the Afton Canyon allotment where erosion is already a problem. Plan, Table 6, p. 77.	The proposed AUM "increaes" in amendments 9, 11, and 13 are already being used under ephemeral authorizations. No on-the-ground change will be made, only a paperwork re-designation. The new use of land for grazing in amendments 10 and 12 would result in soil and erosion impacts as described in Modifications and Corrections section, page 4- The AUM increase due to amendment 14 would be less than two percent on only six allotments; see revised table 4-4 in the Modifications and Corrections section, page 4-25. Any additional AUM allocation increases would not be based on suitability criteria but rather on monitoring.
	AMENDMENT 11	
Natural Resources Defense Council	In like manner, although the statement acknowledges that proposed grazing will have a negative impact on an ACEC (Cronese Basin) designated by the Plan, DEIS, p. 4-34, the Plans's "general management requirement[]" to "control grazing use" in that area is completely ignored. Plan, Table 15, p. 126.	Controlled use of grazing does not mean elimination of grazing. Under plan amendment 11 no new on-the-ground AUM's would be authorized (see previous response). This would bring stability to the livestock operator's ranch program and correct a misnomer, "Control", as used in the Plan, Table 15, p. 126, refers to reducing or eliminating livestock usuage in site specific conflict cultural areas and wildlife areas. These issues will be addressed in the livestock AMP due for release in January 1983 and by this ACEC Plan.
	AMENDMENT 13	
San Bernardino County Planning Department	The EIS doesn't quantify the long-range impacts of returning to original use levels. Care should be taken in allocating AUMs on these unique and popular dunes so that passive recreation, study, and solitude are not displaced. These dunes are very important to the integrity of the eastern Mojave experience.	No change is anticipated in the long-range impacts. Even though no perennial forage is allocated currently under the "ephemeral-only" designation, the fact is that perennial forage is available, and livestock do eat it. Livestock will not significantly use the higher, soft, sandy dunes which provide a unique recreational opportunity.

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Commentor	Comment	Response
Yuma Audubon (Also Natural Resources Defense Council)	For example, there is not cost-benefit analysis to support the assertion that fencing is too expensive. We feel that fencing would be well worth the cost to protect such a large number of unique animal species. The CEQ 1979 Final Regulations require Federal agencies to provide environmental impact statements which include a full and fair discussion of impacts and which inform the public of reasonable alternatives to avoid or minimize the impacts. By not considering fencing the dunes as an alternative, this EIS has fallen short of the requirement.	The fencing of the entire Kelso Dune system, which is currently grazed on an ephemeral basis, would cost an estimated $150,000. This is based on an estimated 30 miles of 3 strands of barbed wire, at $5,000 per mile, to fence the entire boundary. Drift fences to stop livestock movement to particular areas have been considered. The dunes proper are in the southeast portion of the area grazed on an ephemeral basis. A drift fence on this edge would keep cattle from entering the southeast area, but any future extension of water by the racher along the northern edge of the dunes would require total dune fencing. Thus, total fencing would be required.
Natural Resources Defense Council	Similarly, the draft does not consider requiring herding to keep livestock off the Kelso Dunes to protect their unique resources, DEIS, p. 4-37, in lieu of the fences that the Bureau now wishes not to build.	Herding of cattle is not a practice used in the southwest, although sheep herding is quite common. Because herding would require constant movement by a wrangler and because it would require several wrangelers to patrol the dune boundary, it was determined to be totally impractical. Fencing would be more feasible since it is not a recurring cost but fixed. Most people think of the dunes as the highly visible 10 sections at the base of Granite Mountain. However, the ephemeral designation covers 45 sections. To totally eliminate grazing on the Kelso Dunes, 30 miles of fencing would be required at $5,000 per mile or $150,000. Livestock do not use the major dune area, but the adjacent sandy regions where the sand is stable and perennial grass species grow.

TABLE 3-1
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Commentor	Comment	Response
	AMENDMENT 14	
Natural Resources Defense Council	In addition, the draft completely overlooks the impacts to these animals that will result from eliminating the suitability criterion for slope as proposed in amendment 14. That particular criterion was used as a mechanism for protecting and enhancing sheep populations in development of the Desert Plan. See Plan, pp. 73-74; App. XIII, p. 45. If it is eliminated, the resultant plan will not "allow for increase in herd numbers" and will not "provide for lower utilization in joint use ranges." App. XIII, p. 45.	A specific allocation was made for wildlife only for areas outside of the slope and distance-from-water exclusions. No allocation for wildlife was necessary within the exclusions because no forage was allocated for livestock. When these exclusions are removed, an allocation for wildlife must be made. Table 4-4 has been modified (see Modifications and Corrections) to allocate forage to deer and bighorn sheep under Proposed Amendment 14. The Proposed Amendment is only a change in allocation and not a change in livestock management. Under the present exclusions, livestock are not physically prevented from entering bighorn sheep range. Thus, there will be no change in the impact on livestock beyond the increases in forage allocation. The computed allocation for bighorn sheep is double that required to support the current population (estimated). Thus, there is consideration given to herd increase.
Natural Resources Defense Council	[The Draft] ignores the overuse of lower slope lands and those nearer water that will undoubtedly result from adoption of amendment 14. See, e.g., BLM, Managing the Pulic Rangelands -- Public Review Draft (November, 1979), p. 12.	The amendment would cause the number of grazing animals to increase by an estimated 1.389% (Table 4-4). Such a small amount should have a very minor effect on erosion.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
Naval Weapons Center	The NAVWPNCEN is working closely with the Desert District Ridgecrest Area Office in reevaluating cattle grazing on the Center's portion of the Lacey-Cactus-McCloud Allotment. The contents of this amendment do not clearly describe exactly what criteria in the Grazing Element are being changed and how these changes could affect the present reevaluation, i.e., where in the original Plan are these criteria discussed. Please clarify this issue in the Final EIS so the Center can evaluate consequences to proposed internal management plans. Water is the critical limiting factor for desert wildlife. Steep slopes in the desert are particularly subject to erosion resulting from grazing impact. If this amendment means that these two constraints will no longer be used in setting grazing capacity, it could lead to additional adverse impact. This is particulary the case at spring locations where trampling impacts can devastate local native flora and fauna populations. Such potential impacts are not even addressed in the Draft EIS. In the final, the exact consequences of the proposed amendmendment must be described and evaluated if the BLM is to properly consider it.	The plan amendment will remove the written criteria and allow reauthorization of 1034 AUMs on six allotments. Future changes in forage allocation will be based on monitoring information collected in key field locations. If over utilizatin is occuring on gentle slopes and near water areas, then reductions in stocking levels would occur. There is no provision for suitability criteria within monitoring factors, but the net result would be less grazing in lower potential or nonsuitable areas.
	AMENDMENT 20	
Naval Weapons Center	The only reason offered for the proposed amendment to resolve unspecified resource conflicts. What are the specific resource conflicts? Without clarifying this issue in detail, it will be impossible to evaluate conflicts with NAVWPNCEN activities in Mojave B South and the Air Force's heavy schedule of training activities at Superior Valley Weapons Delivery Range.	Alternative B attempted to provide for greater recreational and mining access to a portion of the planning unit outside of sensitive archaeological and wildlife areas. However, the range of crucial Mojave ground squirrel habitat extends further west than the Draft EIS indicated. In addition, although the proponent states that large-scale mineral activities in this area make class L designation inappropriate in practice a change from L to M would have little long-term effect upon mining operations. The access provision of the 1872 mining law provides access to all public lands regardless of multiple use class. As noted in the Draft EIS, preferred Alternativ B would improve oportunities for competitive and commercial ORV use but would degrade the setting and opportunities for all other forms of recreation presently using the area. The class change would increase use conflicts between recreation users and competitive ORV users (see pages 4-46 of DEIS). In conclusion, the proposed amendment would result in significant resource conflicts, while Alternative B fails to resolve those conflicts. Therefore, the preferred alternative recommends rejection.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
	AMENDMENT 25	
Desert Tortoise Council	The Council believes that accepting this amendment would result in more deleterious effects to the Chuckwalla Bench ACEC and feels that the EIS does not adequately address the potential impacts of this amendment. It fails to even mention that the area to be changed is within the Chuckwalla Bench ACEC.	The discussion of impacts does not adequately address wildlife and the ACEC. The revised discussions can be found in the Modifications and Corrections section, page 4-26.
	AMENDMENT 26	
Yuma Audubon	This amendment should be rejected because insufficient alternatives were considered and because of adverse impacts on animals and plants. Closing the bridge that allows access to this area should have been considered as a separate alternative, with access only for Imperial Irrigation District and BLM personnel by means of a gate and lock.	The preferred alternative for this amendment has been changed. It would be rejected for the reasons outlined in Table 1-1.
	AMENDMENT 28	
Yuma Audubon	We oppose adoption for technical reasons. The text of the analysis in the EIS (PP. 4-59, 4-60) is obviously incomplete, precluding evaluation of the impacts of the proposed amendment. This amendment should be reconsidered when the complete analysis is presented to the public.	The top two paragraphs on page 4-60 were reversed. They are actually parts of one paragraph. The second sentence of this paragraph should begin: "No new mineral...".
	AMENDMENT 29	
Yuma Audubon	Here we once again support rejection because adverse impacts to cultural resurces would occur, yet no mitigation is proposed and it is not stated whether the areas has been surveyed to determine which sites are eligible for inclussion in the National Register. Destruction of National Register included or eligible sites must be mitigated. We would rather not see the sites destroyed at all, even with mitigation.	A change from suitable to non-suitable for wilderness will not itself affect cultural resources, but some activities that will become allowable under a non-suitable designation may. Prior to any of these activities, appropriate inventory and mitigation procedures will be carried out in accordance with the Programmatic Memorandum of Agreement and other applicable regulations.

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
San Bernardino County Planning Department	AMENDMENT 30 In order to clarify the statement in the EIS (4-64); although saleable Mojave Yucca do occur on the private lands within Woods Wash, the County Planning Department and Department of Agriculture have adopted a policy of not issuing yucca harvesting permits in the Wash in the vicinity of Woods Mountain in order to protect the unquestionably superb archaeological sites and prime stands of barrel and other cacti. We are willing to consider the conditioning or cessation of yucca harvesting permits in any area of private land adjacent to high resource value public lands.	The text of the Draft EIS (page 4-64) has been revised to reflect this comment. See Modifications and Corrections, page 4-27.
San Bernardino County Planning Department	AMENDMENT 32 We support the northern boundary adjustment to "non-suitable" and suggest as an alternative that this amendment be included with Amendment #31. We also suggest that BLM consider the option of initiating a land-exchange in the west part of WSA 250 to protect its integrity for future wilderness designation while allowing the owners of the included private parcels to obtain lands elsewhere more suitable for development.	The preferred alternative has been changed to recommend clas C status for the west part of WSA 250. See Table 1-1.
Yuma Audubon	AMENDMENT 45 First, this is yet another amendment which would cause adverse effects on cultural resources (EIS, p. 4-104) yet no mitigation is proposed. And again, it is not stated whether this area has been surveyed and sites evaluated for eligibility for inclusion in the National Register.	This amendment is being recommended for rejection under the final EIS preferred alternative (see Talbe 1-1).

TABLE 3-1
Specific Comments and Responses

Commentor	Comment	Response
	AMENDMENT 47	
Margaretha Krucker	In compliance with your request I am sending you a map on which I outlined the western-end border line of the area for which we request a change of the multiple-Use Class. The north, east and south border lines re correct in the Draft Environmental Impact Statement for Amendment 47.	The map has been revised; see Modifications and Corrections, page 4-40.
Margaretha Krucker	The area which has some riparian vegetation starts just west of what we call the lower spring and continues down the lower part of Pleasant Canyon in a westerly direction.	References to riparian habitat have been deleted (see Chapter 4).
Margaretha Krucker	May I also point out to you that in the Draft E.I.S. on page 4-83, Amendment 47 is suggested from Class L to Class I, whereas in all other sections of the Draft Amendment 47 is suggested for Class M.	Class M is correct; all reference in the Final EIS are consistent with this.
	AMENDMENT 49	
Yuma Audubon	No quantitive documentation has been provided to support the need for this amendment. Diagrams of camping patterns, to scale, based on actual outings, would have been helpful in evaluating the need for this amendment.	The World of Rockhounds Association has submitted information that indicates that a minimum of 300 feet is required to ensure safety and the quality of the camping experience. The group reported that they have documented campsite patters over a period of two years indicating that campsite diameters are approximately 200 feet and that the distance from a main road varies from 200 to 600 feet.

CHAPTER IV

MODIFICATIONS AND CORRECTIONS

CHAPTER 4

MODIFICATIONS AND CORRECTIONS

Chapter 2, Pages 2-16 to 2-27, Amendment Six, is revised to read as follows:

AMENDMENT SIX:
BARSTOW-TO-VEGAS

Proposal

Designate a motorcycle course running from Alvord Road near Barstow to Stateline, Nevada (see map 2-1). An authorized route would be established with definite guidelines for its use. Certain course options would be included so that the course could be varied somewhat from year to year. The first permit would be issued for a race on Thanksgiving weekend, 1983. ~~Portions of the course might also be used for other smaller scale motorcycle events~~. The main use of the proposed course would be an annual Barstow to Vegas hare hound (or mass start) race. The EIS focuses on the impacts of this particular event since it would generate the most impacts of any proposed use. Limitations will be made on the amount of use permitted; a monitoring program will determine what further limitations, if any, would be applied (see Permit/Use Guidelines, #3).

The course in Nevada would vary from year to year. A route would be selected and studied by Nevada BLM in early 1983 for possible use the following Thanksgiving.

Although a mass start race is proposed as the major use, other types of events, such as trail rides or an enduro event, can also be permitted, so long as they conform to use guidelines. For the mass start event, a main course and five options (a fifth was added to the four discussed in the DEIS), as well as an alternative location for pit 2 will be considered for selection by BLM managers.

A "no action" alternative is discussed in the chapter on Environmental Consequences, and addresses possible impacts associated with trail rides that likely would continue in the absence of a permitted Barstow to Vegas race.

History

The San Gabriel Motorcycle Club began this event on Thanksgiving weekend, 1967, with about 500 entrants. Over the next seven years the Barstow-to-Vegas Race became the largest, most prestigious motorcycle event in the world, with 3,000 entrants in 1974, the last year a permitted event was run. With that many entrants and perhaps 7,000 spectators and support crews, the race had grown to to the point where no controls, no matter how effectively implemented, could keep impacts down to an acceptable minimum. San Gabriel has applied for a permit every year since 1975, but BLM has always denied the request. Since 1975, there has been an annual protest trail ride. Small groups of riders have used various routes to get from the traditional start area to Las Vegas. The San Gabriel Club has tried to establish a Beatty-to-Vegas Race in an attempt to disassociate themselves from this protest ride and offer an alternative to it, but has been unable to attract enough participants to make it worthwhile. In spite of the Club's efforts, Barstow-to-Vegas protest rides have continued. No system was established to assist injured participants during these rides. People have become lost, private lands were trespassed, and resources have been damaged.

The Barstow-to-Vegas Race is being reexamined by the BLM at this time because of several factors:

- This race still enjoys considerable support by the motorcycle racing community.
- Since 1974, procedures and rules that allow better controls on these events have been developed by desert racers. For example, AMA has been able in similar recent events to greatly curtail playriding in pits. This was a source of much unnecessary impact during the 1974 race.
- Pitting crews have been consolidated so that one crew pits for several individuals or small clubs, reducing gas consumption and the need for large pit areas.
- Similar events authorized by the Desert Plan, such as the Johnson Valley-to-Parker Race, have been run very well and are compatible with objectives of the Plan to provide protection for desert resources while allowing these uses to occur.
- A maximum of 1200 entrants will be allowed, with no more than 400 in each starting wave, significantly reducing the chance for a recurrence of the problems during the 1974 race.

Race Description

The Barstow-to-Vegas Race would be the largest scale event to use the proposed race course. Other types of motorcycle events may also be allowed to use portions of the course so long as they meet use guidelines and limitations described below. These events would involve substantially fewer participants and would use single starting groups. However, no other events would occur at the same time as the Barstow-to-Vegas race. In other words, there would be no concurrent trail ride.

The Barstow-to-Vegas Race is a long distance, point-to-point contest, often referred to as a Hare-Hound race. Participants line up shoulder to shoulder at the start, forming a line approximately one-half mile long (assuming 400 riders per wave). A signal is given, and all racers stop their engines. Another signal starts the race. The "wave" of riders aims for the "bomb," which is simply a target 3 miles away. By the time racers reach the bomb, the faster riders will have moved to the front, allowing a column to form that becomes narrower as the race progresses.

From the bomb to Mile 6 most impact will be to an area approximately 50 feet wide, with some riders straying in an area 150 feet beyond that. Total area of impact would be about 200 feet wide. After Mile 6 and for the duration of the course heavy impact should be limited to an area 15 feet wide with some straying 85 feet beyond that. The total impact area would be 100 feet wide. When the course is on roads, monitoring of similar events shows nearly 100 percent of the participants stay on the road surface. The only exception is an occasional rider with a breakdown, riding off the course for safety reasons.

Allowing three waves of riders, leaving at 20- to 30-minute intervals, provides time to clear the start area of breakdowns or injuries, and help prevent bunching up of riders along the course. Three stops are made for gas and minor repairs. Racers will be encouraged to pool their resources by using the same pit vehicle/crew. Crews will be stationed the night before at pits 1 and 2. The pit 1 crew will leapfrog to pit 3.

The first racer to reach the finish area near Las Vegas is the overall winner. In addition, trophies are given for the best time in each class of racer and vehicle. As many as 120 trophies could be given out if 1200 enter the race. No cash prizes or industry-donated prizes are awarded for the Barstow-to Vegas race.

Spectators will be allowed at the start/main camp and the pit areas. With 1200 entrants, an additional 3,500 to 4,000 support crew-family-spectators are expected. Concentrations will be heaviest at the start/main camp, pit 1 and pit 3.

The Barstow-to-Vegas Race is the largest scale event to use the proposed race course. All or portions of the course likely will be considered for other motorycycle events, with the same use guidelines described below applying to them. Other events would probably involve substantially fewer particpants and use single starting groups.

Course and Options

BLM worked closely with the American Motorcyclist Association (AMA) to determine what course would be considered in this EIS. BLM prepared maps showing wilderness study areas, Areas of Critical Environmental Concern (ACECs) and other known environmentally sensitive areas. AMA then developed a course that avoided as many of these areas as possible, and used well established routes, so that insignificant additional impact would result. Concerns voiced in previous years were considered during the selection process. For example, no consideration was given to any off-road course in Cronese Basin or Clark Mountain ACEC.

Use of private land was kept to a minimum. Where feasible, courses held in the past for races other than Barstow-to-Vegas were incorporated. In general, areas chosen for the course and for the three pits had previously been disturbed and/or were known to be low in environmental concern.

After the evaluation of possible routes was completed, a main course and three pit areas were selected for study. Five short course options and an alternative location for pit 2 are also assessed. These options will provide alternates for environ mental mitigation; if all or some are approved for use, they will provide a sponsor some variety for annual events. The course and options selected would constitute the California portion of the course.

A fifth option has been added to the four which were analyzed in the DEIS. It would make use of the maintenance road associated with the LA Department of Water and Power transmission lines north of Clark Mountain. The route would leave option 2 in Kingston Wash, follow the maintenance road east for seven miles, and rejoin option 2 near Keany Pass. The route will also be used for a new transmission line to be built adjacent to the existing lines as part of the Intermountain Power Project.

In Nevada, the course would vary from year to year. Nevada BLM (Stateline-Esmeralda Resource Area) is currently reviewing public lands for ORV designation. Once decisions are made early in 1983 to open, close or limit areas to off-road vehicle use, a course will be laid out in conformance with those designations.

The main course in California begins on Alvord Road (30 miles east of Barstow on I-15), the traditional start area for the old Barstow-to-Vegas Races. Camping has occurred near the start, and to the south along the Alvord Road.

These areas were chosen for the proposed course because of past impact and low resource sensitivity in the immediate area. Pit 1 is along Rasor Road, the northern border of the Rasor Open Area. This was the site of the 1974 pit 1. Pit 2 is 1.5 miles north of I-15 and 1 mile west of Old Valley Wells. A well graded road would be used by the support vehicles. The 1974 pit was along another dirt road one-fourth mile to the east. Alternate pit 2 is 1.5 miles north of Halloran Spring in a large area used by Caltrans to obtain aggregate for the construction of I-15. Pit 3 is immediately north of Ivanpah Lake near Stateline, Nevada, in a site once used as a trash dump. The original pit 3 was on the lake bed. The course in California is approximatley 110 miles long. For a breakdown of type of terrain crossed, see Table 2-1. Detailed maps of the course are in Appendix B.

Course Options Considered but not Studied

- Start in Johnson Valley Open Area: rejected because of safety concerns in crossing Santa Fe Railroads's main line, and possible conflicts with management guidelines of wilderness study areas north of I-40.

- Use the proposed right-of-way for the Intermountain Power Project (IPP) transmission lines: rejected because it would provide very little rider appeal, would be difficult to keep racers on one route due to the proximity of planned maintenance roads, and would likely require substantial rerouting after construction began.

- Make exclusive use of existing roads: the exclusive use of the Victorville-McCullough power line road or a small pole line road just north of I-15 was rejected because such a course would not be supported by the motorcycle community. The selection of either route by BLM would be equivalent to rejecting the amendment. Rider appeal and safety of the participants must be considered along with environmental issues.

- Use the old Barstow-to-Vegas course and alternates studied in 1974: certain portions of the 1974 course are incorporated in this proposal; other sections were too environmentally sensitive for such use, as shown by the 1975 post-race evaluation.

- Use a route through Afton Canyon: rejected due to safety concerns for use of a maintenance road alongside the Union Pacific Railroad, and wildlife concerns in the Mojave River zone.

Future Course Changes

Any permitted race will be monitored for compliance with permit stipulations. Some course/pit changes may be recommended to reduce environmental impact provide a safer course, reduce private land use, or reduce user conflict. In choosing new options, priority will be given to areas previously authorized for other activities, or areas that have been previously disturbed. The changes will be described and analyzed in the EA prepared for each event, giving the public an opportunity for review and comment. If major changes are proposed, BLM will consider the option of assessing such changes through the Desert Plan Amendment process.

Relationship to the Desert Plan

The Barstow-to-Vegas course would join the Johnson Valley-to-Parker, Parker 400 and Stoddard-to-Johnson Valley courses as Plan - designated competitive routes.

Approval of the main course, or options crossing "L" areas for this course, would consititue designation of approved routes (Desert Plan, p. 84). In Class L areas, the course lies in washes, on old roads, or on previously used cross-country courses for all but 1.5 miles. These are all in previously disturbed areas.

Designation Criteria (CFR 8342) Followed

8342.1 Designation criteria.

The authorized officer shall designate all public lands as either open, limited, or closed to off-road vehicles. All designations shall be based on the protection of the resources of the public lands, the promotion of the safety of all the users of the public lands, and the minimization of conflicts among various uses of the public lands; and in accordance with the following criteria:

(a) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands and to prevent impairment of wilderness suitability.

(b) Areas of trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered species and their habitats.

(c) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions to populated areas, taking into account noise and other factors.

(d) Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established.

The course was selected in Class L areas that meet these criteria to minimize environmental impacts while providing an appropriate route for ORV events. The previous discussion titled Course and Options demonstrates the care used in route selection. This, coupled with the low-level impacts, demonstrates compliance with the regulations cited above.

TABLE 2-1

TERRAIN CROSSED BY THE COURSE (MILES)

Race Section	Roads	Washes	Cross Country Old Courses	Cross Country New Courses
Start Cone			3	
Bomb to Mile 6			3	
Mile 6 to Pit 1	7	16	8	0
Option 1			6 1/2	
Pit 1 to Pit 2	28 1/2	8	11	0
Pit 2 to Pit 3	19	5 1/2	0	1 1/2
Option 2	5	14	5	0
Option 3	2 1/2	3	0	0
Option 4	2 1/2	0	0	0

Start to Pit 1	31 miles
Pit 1 to Pit 2	47 1/2 miles
Pit 2 to Pit 3	26 miles

Pit 1 to Alternative Pit 2	30 miles
Alternative Pit 2 to Pit 3	42 miles

Permit/Use Guidelines

A Special Recreation Use Permit (SRUP) is required for any competitive or commercial event using public land. Since events can begin in California or Nevada, the BLM office in the state of origin will issue the permit. It is expected that the San Gabriel Motorcycle Club (AMA District 37) will be the prime user, but BLM will consider other applications for events using all or portions of the Barstow-to-Vegas course. Multi-year permits for annual events may be considered.

Fees will be assessed to recover the costs to BLM of issuing the permit. These costs will include those associated with monitoring, mitigation and compliance. Any funds not expended would be returned to the sponsor. Additional costs could also be assessed. While a precise estimate of costs cannot yet be made, it is estimated they would amount to approximately $20,000 based on 8 workmonths of BLM employee time at $2,600 per workmonth.

For the 1983 event, the race sponsor must have an application on file with the California Desert District Manager within two weeks of the publication of the Record of Decision, together with approximately 40 percent of the cost-recoverable fee (to fund field work which must be done in late spring). Approximately $5,000 of the remaining $12,000 cost recoverable fee would be required 30 days prior to the event, with the remainder due by January 1. Within 30 days the sponsor will supply the District Manager with written permission from the State of California Department of Transportation and San Bernardino County. The intent of the schedule is for the Bureau to issue the SRUP within 90 days of the Record of Decision publication.

This EIS fulfills the NEPA requirements for the first (1983) event. For each future event, an Environmental Assessment (EA) will be prepared. The EA will be based on the results of compliance and monitoring of preceeding events. The type of event will be described, the course mapped, and any modification to the course or guidelines in this EIS will be analyzed. Each EA and permit will include a complete list of stipulations. These will generally follow the guidelines below; appropriate BLM specialists and the race sponsor will develop detailed measures to implement the guidelines. To insure that these measures are carried out, a performance bond will be posted with BLM before a permit is issued. Bonds will vary from $500 to $5,000 depending on the type of race proposed and number of entrants.

The first two requirements must be met before a permit is issued. The third puts limits on the course's use. The rest will be attached to a permit.

1. The sponsor will obtain permits, file fees or provide notification as follows; except as provided above for the 1983 event:

    a. Private Landowners

        Permission in writing must be obtained from owners of all lands crossed by the course at least 60 days before the event.

    b. State of California

        Lands Commission: written permission will be obtained to cross all state owned lands sections.

Cal Trans: an encroachment permit will be obtained to cross under I-15.

c. San Bernardino County

The sponsor will obtain all permits required by County ordinances and file appropriate fees.

d. Rights-of Way (R/W)

The sponsor will notify all affected R/W holders as least 60 days in advance of any race, and will be required to follow any reasonable additional stipulations to avoid use conflicts and/or restore routes used to the condition existing before the race. Written agreements will be obtained from these parties.

e. Other User Groups

The sponsor will notify all mining claim holders of active properites, grazing leasees and other authorized users at least 60 days in advance of any race, and will be required to follow any reasonable additional stipulations to avoid use conflicts and/or restore routes or improvements to the condition existing before the race. Written agreements will be obtained from these parties.

2. A certificate from an insurer must be presented before a permit can be issued. It must state that insurance is in force, that the insurer will give BLM 30 days notice prior to cancellation or modification of such insurance, and that other affected parties are named as additional insureds to protect against liability.

Limitations

3. a. The maximum number of participants allowed for any event will be 1200. There will be a limit of 400 for any one starting wave.

b. Only one mass start event will be allowed each year.

c. The main course in WSA 242 will be permitted for use no more than once a year while the area remains under wilderness study. Use would be discontinued if the area is designated wilderness.

d. Option 1 (in WSA 242 and the portion of option 2 in WSA 225 will be permitted for use no more than once every three years while the areas remain under wilderness study. Use would not be permitted in either area if designated as wilderness.

General

4. Prerunning will not be allowed for the Barstow-to-Vegas race. However certain non-sensitive portions of the course may be used for prerunning for small-scale events. (The EA prepared for specific events will authorize and identify these segments).

5. Entry will be by mail only. This requirement may be waived for events involving fewer than 100 entrants.

6. Sponsors will prepare handouts to be sent to all entrants and made available to participants and spectators as they arrive. Maps and rules of conduct will be included to clearly show what activities are or are not allowed, and where. Sponsors will undertake a race safety awareness program to reduce the possibility of collision or injury to any of the racers or casual riders.

7. All trash, course markings and other race-related debris will be removed within 15 days after an event. If an event is cancelled, any markings or debris will be removed by the sponsor 15 days after notifying BLM of the cancellation. Failure to do so will result in a minimum charge of $400 for contracted clean-up services.

8. All sensitive areas requiring special mitigation will be identified to the sponsor. Before a permit is issued, the sponsor and appropriate BLM specialists will develop site-specific measures to protect resources, promote safety or reduce use conflicts. These measures will be attached to the permit as stipulations and will be included in the EA for the event. Measures/stipulations could include extra flagging, temporary fencing, on-site monitors or special signs. Areas already identified for special attention include Colosseum Gorge, the Mojave Sink, Soda Lake and Crucifixion Thorn Unique Plant Assemblage.

   Note: The sponsor will be required to contract for the collection and curation of artifacts. Such mitigation would be a one-time cost. See Chapter IV, Mitigation for sites requiring this action.

9. The sponsor will restore to the satisfaction of BLM's Authorized Officer any lands requiring soil, vegetative or other environmental stabilization as a result of an event.

10. At road crossings, all riders will be required to come to a full stop, then walk their bikes across when the way is clear. Failure to do so will result in disqualification.

11. The sponsor will be required to provide emergency medical service with good radio communications for emergency response.

12. The sponsor will discourage participants from collecting or disturbing wildlife, livestock, cultural artifacts and vegetation. There will be no collection of dead and down wood for campfires.

13. The sponsor will appoint marshalls for the main camp, start cone, pits, and finish area. The marshalls will be responsible for enforcing all applicable permit stipulations; the period of responsibility will be specified in the permit.

14. The sponsor will contract for law enforcement services for the main camp and start cone; other areas may be specified in the permit. One officer per 500 spectators/entrants will be required.

Camping Areas

15. a. Camping will be allowed only at the area south of the start (main camp), pit 1, alternate pit 2, pit 3 and finish.

    b. No parking or camping will be allowed within 500 yards of waters.

    c. Camping areas will be clearly marked on the ground and mapped in the handout prepared by the sponsor.

    d. Play riding will not be allowed at the main camp, pit 2, alternate pit 2 or pit 3.

    e. If necessary, speed limits will be posted.

Start Cone

16. a. Boundaries will be clearly marked on the ground and mapped in the handout. The marshall will take steps to keep spectators and entrants within the area specified in the permit.

Pitting Areas

17. a. Each pit will be limited to 8 acres of impact (approximately 100 X 3,400 feet). The marshall will clearly identify the boundaries of the approved pitting area and take steps to keep spectators/entrants within those bounds.

b. Traffic patterns will be clearly signed to allow one-way traffic flow.

c. Spectators will be allowed at each pit. Spectator parking areas will be clearly marked and will be separate from the area for pitting vehicles. (Pit 1 is located along the northern border of an Open Area. It is recognized that use patterns in such areas may make it difficult to clearly separate pitting from other uses).

Note: Item 15 (d) prohibits play riding at all pitting areas, with the exception of pit 1.

Course

18. a. The centerline will be marked with flagging, lime, or flagged stakes as appropriate for the terrain.

b. From the bomb to Mile 6, maximum allowable width is 200 feet, with exceptions noted below.

c. From Mile 6 to finish, maximum allowable width is 100 feet with the following exceptions: On roads, the course will be restricted to the road surface (i.e., berm-to-berm). In washes narrower than 100 feet, the course will be restricted to the width of the wash.

d. Spectators will be discouraged from lining up along the course. If necessary, portions of the course will be closed to non-race related use the evening before and during the race to provide for public safety.

e. Course marking for the Barstow-to-Vegas Race will be completed at least four weekends before the date to insure adequate time for inspection and any necessary corrections or additions.

f. Hazards will be clearly marked according to AMA regulations.

g. Turns will be marked to avoid excess straying.

h. Checkpoints will be established at areas other than pits to decrease course cutting or to give protection to environmentally sensitive areas.

i. Gates will be closed after any race unless the sponsor is notified otherwise. The sponsor must coordinate how gates are to be left with BLM and the grazaing leasee.

These stipulations may be altered or added to, based on data gathered from monitoring or from new information.

Chapter 3, Page 3-14, Add new section after section entitled "Options 3, 4":

"Although there are sites located to the sides of road option 5, none would be directly impacted by this proposal."

Chapter 3, Page 3-16, Section entitled "Officially listed and Sensitive Plants." First paragraph, delete the words "directly on or." Fifth paragraph, replace "directly on" with "along."

Chapter 3, Page 3-20, Add after Number "6, Seeps and Springs," the following section:

> "7. White Fir. Location: Pit 2 to Pit 3, main course. Description: This assemblage of relict conifers is the largest and best stand of white fir in the higher mountain ranges of the eastern Mojave desert. It occurs on steep, north-facing slopes of Clark Mountain."

Chapter 3, Page 3-26, First Paragraph, revise as follows:

"Approximately 7 miles of the main course is through desert bighorn sheep (BLM Sensitive) range in the Clark Mountains, all on existing roads. The main course goes right by a known bighorn sheep water source (Green's Well). ~~and within 3/4 mile of a bighorn sheep guzzler installed by the California Department of Fish and Game~~. Three more water sources occur adjacent to the course in in Colosseum Gorge. The desert bighorn sheep is fully protected in California."

Chapter 4, Page 4-6, Add new alternative B analysis presented below, and change No Action to Alternative "C":

Alternative B: Open Dunes by Permit Only; Designate Access Corridor and Camping Area

"Cultural Resources

The types of impacts described for alternative A would still occur under alternative B. However, with the are to be opened reduced, the specific number of sites to be impacted would be considerably reduced. Since very little of the area has been inventoried, the actual number of sites involved is unknown. The smaller area proposed for opening is a more manageable size in terms of realistically being able to inventory it for cultural resources. The proposed access route would also require inventory.

"The designated camping area on the east side of Lake Hill Island would impact a highly sensitive area. Since unauthorized camping is already occurring here, this situation is already a problem.

"Another problem with this alternative might be keeping users within the confines of the designated open area and access route.

"Wildlife, Wilderness, Wild Horses and Burros, and Motorized Vehicles

"Impacts would be as described for alternative A"

Chapter 4, Pages 4-10 to 4-12, replace Cultural Resources Section and Table 4-1 with the following:

"Cultural Resources

"Direct impacts on cultural resources generated from the participants would be limited primarily to the race course and pit area. Direct impacts would result from vehicles passing directly through and over the resources causing disruption, breakage and spatial displacement of artifacts and cultural features. It is assumed that any resource within 200 feet of the off-road portions of the course are subject to direct impact. For portions of the race course route which follow graded dirt roads, it is assumed that direct impacts would be confined to resources within the road or road margins. Direct impacts to archaeological sites in or near spectator or pit areas are caused in the same way as the above and also by illegal collection.

"Indirect impacts would be associated with the activities of spectators, campers and any increase in non-race associated off-road vehicle activities. Off-road vehicle use by some spectators seeking vantage points outside the start and finish areas and pit areas could result in disturbance to cultural resource sites.

TABLE 4-1

BARSTOW-TO-VEGAS MOTORCYCLE RACE - 1983
Archaeologcial Sites On and Near Race Route
Unmitigated Impact Assessment

SITE NO	LOCATION	SITE DESCRIPTION	IMPACT		COMMENTS
			DIRECT	INDIRECT	
4-SBr-129	Cave Mtn USGS 15' Quad	Prehistoric temporary camp site	N	N	No site was found despite concerted effort to relocate the site on foot.
4-SBr-541	Soda Lake USGS 15' Quad	Lithic Workshop/prehistoric temporary camp associated with Soda Lake	N	N	Appears to have been completely collected during an archaeological investigation in 1974.
4-SBr-268	Soda Lake 15' USGS Quad	Lithic scatter	L	N	Site was collected in 1950. A few artificats remain.
CA-069-152	Soda Lake 15' USGS Quad	Large lithic scatter with various artifacts	H	N	Recommend Nat'l Reg documentation and collection of site. Site should be photographed and mapped.
Halloran Spring Off Ramp	Halloran Spring USUS 15' Quad	Petroglyphs, pottery, lithics	L	M	Post spring area and patrol to keep spectators away from spring areas on the way to alternate pit 2.
Valley Wells Area	Mescal Range USGS 15' Quad	Lithic scatters, rock-shelters	M	M	Avoid by use of alternate pit 2 and reroute course north see map 9).
4-SBr-906, 906A, 906B, 906C	Clark Mtn 15' Quad	Agave Roasting Pits	L	N	Clearly mark road with lime and flagging.
CA-069-151	Clark Mtn 15' Quad	Agave Roasting Pits	M	N	Clearly mark road with lime and flagging.

H=High M=Medium L=Low N=Negligible

TABLE 4-1

BARSTOW-TO-VEGAS MOTORCYCLE RACE - 1983
Archaeologcial Sites On and Near Race Route
Unmitigated Impact Assessment

SITE NO	LOCATION	SITE DESCRIPTION	IMPACT		COMMENTS
			DIRECT	INDIRECT	
4-SBr-3173	Alvord Mtn USGS 15' Quad	Isolated artifact - small lithic scatter	L	M	
4-SBr-3174	Alvord Mtn USGS 15' Quad	Lithic Workshop debris	H	M	This site is located between the access road and the spectator area. Site collection is recommended.
4-SBr-3180	Alvord Mtn USGS 15' Quad	Lithic Workshop debris	L	M?	
4-SBr-3181	Alvord Mtn USGS 15' Quad	Lithic Workshop debris	L	M?	
4-SBr-3739	Alvord Mtn USGS 15' Quad	Large Quarry Area	L	M?	
4-SBr-875	Alvord Mtn USGS 15' Quad	Lithic Workshop debris	L	L	
4-SBr-877	Alvord Mtn USGS 15' Quad	Lithic Workshop debris	N	L	
4-SBr-3178	Alvord Ntn USGS 15' Quad	Lithic Workshop debris	N	L	
4-SBR-2835	Alvord Ntn USGS 15' Quad	Lithic Workshop debris	N	L	
4-SBr-2154	Cave Mtn USGS 15' Quad	Lithic scatter/temporary camp	H	L?	This site is located directly on the race course. Recommend National Reg documentation and collection of site. Site should be photographed, mapped.
4-SBr-2219	Cave Mtn USGS 15' Quad	Cores & flakes, scattered	H	L	Same as 4-SBr-2154 comments
4-SBr-2220	Cave Mtn USGS 15' Quad	Scattered cores and flakes	H	L	Same as 4-SBr-2154 comments

H=High M=Medium L=Low N=Negligible

TABLE 4-1

BARSTOW-TO-VEGAS MOTORCYCLE RACE - 1983
Archaeologcial Sites On and Near Race Route
Unmitigated Impact Assessment

SITE NO	LOCATION	SITE DESCRIPTION	IMPACT		COMMENTS
			DIRECT	INDIRECT	
Collosseum Gorge	Clark Mountain 15' USGS Quad	Historic Mining camps. Prehistoric temporary camps and agave roasting pits	L	L	Use of route through Colloseum Gorge is not recommended.
CA-069-153 Ivanpah Lake shoreline near pit 3	Roach Lake USGS 15' Quad	Temporary camp, lithic scatters	H	H	Recommend this area be documented for the Nat'l Reg and site collected (map and photograph site).
	Soda Lake USGS 15' Quad	Old Government Road	L	L	Course crosses the road at one point.
	Soda Lake USGS 15' Quad	Tonopah-Tidewater RR Grade	L	L	Course crosses the grade at one point.
	Alvord Mtn USGS 15' Quad	Old Spanish Trail	N	L?	Trail obliterated in race area. Exact route not known historically.

H=High M=Medium L=Low N=Negligible

"In contrast to direct impacts, impacts may occur anywhere in the area of the race course route, the precise nature of these impacts is difficult to predict. It is assumed that indirect impacts would occur on cultural resources in the vicinity of the race course route. It is probable that resources most affected would be those with high visibility, such as Ivanpah Townsite.

"All recorded sites are listed in Table 4-1. Where appropriate, specific mitigation has been recommended for implementation before a November 1983 race."

Chapter 4, Page 4-14, Last paragraph, change "Potential for Impact: Low" to "Potential for Impact: None."

Chapter 4, Page 4-15, last paragraph, change "Potential for Impact: Low" to "Potential for Impact: None."

Chapter 4, Page 4-16, after last paragraph add new section:

"(g) White Fir. Location: Pit 2 to Pit 3, main course. Potential for Impact: None. This UPA is located approximately 1 mile south of the proposed race course in steep mountainous terrain and will not be impacted."

Chapter 4, Page 4-16, add new section after section entitled "Unusual Plant Assemblages":

"Option 5

"There is no sensitive species or Unique Plant Assemblages along this option. Use of this option would result in less impact to botanical resources than the main course and substantially less impact than option 2, due to the use of a well established road."

Chapter 4, Page 4-21, first paragraph, lines three and four, eliminate "and within 3/4 mile of another (big game guzzler)."

Chapter 4, Page 4-21, add new section after section entitled "Option 4":

"Option 5

"Option 5 would result in less impact to wildlife than option 2 and substantially less impact than the equivalent portion of the main course. Option 5 is not in important desert tortoise habitat but does go through bighorn sheep habitat. Use of an existing road reduces that impact somewhat. Impact to bighorn sheep would be essentially the same as described for Keany Pass (option 2)."

Chapter 4, Page 4-23, change "(IMP; BLM 1979)" to "(IMP; USDI, 1979)."

Chapter 4, page 4-24, add new section after "Wilderness:"

"Reclamation of Wilderness Study Areas

"The IMP requires that temporary impacts must be capable of being reclaimed to a state of being substantially unnoticable in the area as a whole. It is recognized that reestablishment of topsoil and revegetation in arid lands is extremely difficult and expensive. The key element considered below is visual impairment. Visibility of race impacts will result more from new color and line contrasts from disturbance, which can be reduced by dragging a steel grate behind a vehicle, or by hand raking. Direct vegetation damage will generally be low because of sparseness of vegetation and/or a racer's natural inclination to avoid scrub vegetation.

"Following is a list of course segments in WSAs 242 and 225 that may require reclamation and an assessment of the feasibility of such reclamation:

"WSA 242--main course: Use of this segment is not expected to require reclamation. The wash it follows is very wide and active such that effects of an annual race should be completely obliterated within a years time. If necessary, tracks could be dragged or, in isolated cases, hand raked for near 100% successful repair of impacts.

"WSA 242--option 1: Because this segment is within 10 miles of the start, it is assumed that 'bunching' of riders is more likely to occur than on segments after pit 1 (the main course is wide enough in the wash such that bunching would present no problem). Visual impact is considered likely to occur here because the course goes 'against the grain' of drainage systems on the bajada crossed by the course. New lines running perpendicular to the natural grain will tend to stand out more than if the course were routed with the grain. The only feasible reclamation would be erasure of tracks by dragging and/or hand raking, a measure which would be partially sucessful in mitigating impact.

"WSA 225--option 2: Thickness of desert scrub vegetation rules out dragging as an effective reclamation measure. The only feasible measure is raking by hand in selected areas where impact may exceed IMP nonimpairment standards. The segment of option 2 following the old B-V course likely would require the most attention (4 miles). The rest of option 2 is on roads or in washes where dragging is practical and likely quite effective in obliterating tracks. In these latter areas vegetation damage is expected to be light.

"WSA 225--option 3: About 3/4 mile is in the WSA following a wash where dragging or raking would be ineffective in erasing signs of use. The wash is active and therefore self healing.

"WSA 225--option 4: This option follows an old road. If impact is kept to the road surface, no reclamation should be necessary. Vegetation is thick enough to discourage off-road use; if necessary raking of selected areas would be an effective measure."

"WSA 225--option 5: Along the southern border of WSA 225; its use would have no effect on the area's wilderness quality, and would be a highly desirable alternative to use of the portion of option 2 in the WSA."

Chapter 4, Page 4-24, add new section after "Wilderness" and "Reclamation of Wilderness Study Areas:"

"Cumulative Impacts

"The cumulative impact to an area is the aggregate impact of existing and proposed activities. The proposed course, on the whole, makes use of areas already disturbed, such as roads, washes or old cross country courses. To assess cumulative impacts of an annual Barstow-to-Vegas race, the following assumptions are made:

--impacts will be contained within the allotted bound of the course (no trespass of off roads, no more than 100 foot widths cross country)

--the number of riders and spectators will not increase

--on cross country segments, use can be expected to occur in this pattern:

heavy use - to an area 30 feet wide

moderate use - to an area varying from a few feet to 30 to 40 feet (this in addition to the heavy use zone)

light use - anywhere within the 100 foot bounds, from straying

--sharp turns will be areas where straying is hard to eliminate straying; heavy or moderate use will occur to 100 feet, and light use to perhaps an additional 100 feet, if the turn is improperly marked.

"The first race will generate perhaps 75% or more of total new impacts to be expected from an annual race. In each succeeding year, certain areas will experience course widening, while other areas will receive little or no additional impact. In cross country areas not in washes, there will ultimately be a rather well defined track that will tend to be wider than a bladed road. In heavily vegetated areas and in washes, the track will tend to be braided. Areas covered by loose soil will feature 'whoop-de-dos,' similar to moguls on ski slopes. As use of the course continues, vegetative productivity will declines and the time for recovery will lengthen.

"Cumulative impacts are important considerations in judging whether wilderness study areas have been or will be impaired. The main course and options in WSA 242 are discussed below:

"WSA 242

"Main course - The wash used is wide with little vegetation. In part because of its proximity to the start area, bunching of riders is likely to occur, leading to widths of 70 to 100 feet each time the race is run. It is likely that natural erosion from wash activity will erase signs of each event before the next occurs. Cumulative impact is therefore not an issue. Also used is an abandoned road. This route is still clear of vegetation and appears well used. If racers stay on its surface, little or no change is expected in terms of natural reclamation.

"Option 1 - Again, bunching is probable this close to the start. One use would create additional impacts greater than those already existing that would be noticeable as much as one mile from the course, depending on viewing angle. Moderate to heavy impact would occur over a width of 60 to 70 feet. Use would occur a maximum of once every 3 years. With such an interval between uses, the first use becomes the critical one in terms of impairment.

"WSA 225

"Option 2 - For the four mile segment using an old race course, comments for option 1 apply. The remaining segments in washes will show braided use patterns with some new braids likely each year the segments are used. However, natural erosion will reduce the impacts of these braids to a minimum.

"Option 3 - Same comments as for wash segments of option 2.

"Option 4 - Since the segment is an old road, it is expected that use will be limited to its surface. Some vegetation reappearing of the road surface would be damaged, stopping or reversing natural reclamation that is taking place.

Chapter 4, Page 4-26, paragraph 4 is revised to read:

"Disturbance to the ponds at Zzyxx Springs, containing Mohave Chub, would probably not occur as access to the area is controlled by locked gates at both access roads. In addition, the site has a resident caretaker to prohibit vandalism of the ponds and associated facilities. No other species of special significance occur in the proposed open area."

Chapter 4, Page 4-30, paragraph 3 is revised to read:

"Soda, Silver, and Coyote Dry Lakes: Although non-motorized recreation opportunities would be maintained (such as opportunities for solitude and a primitive and unconfined type of recreation), a type of closed area designation would exist that would prohibit recreation uses even though they have little or no impact on natural resources when conducted under permit, or on approved routes of travel."

Chapter 4, Page 4-30, paragraph 7 is revised to read:

"Superior and Harper Dry Lakes: Land sailing would be enhanced, while at the time through-traffic across the lakes would be permitted. ~~However, creating a "limited" ORV area designation may confuse some recreation users.~~"

Chapter 4, Page 4-33, insert new section after Livestock Grazing:

Soils

"Increased grazing in the Afton Canyon allotment would cause some increased soil compaction at watering sites and on trails. This would represent a very low percentage of the total surface. Some increased erosion may occur in very localized areas adjacent to the compacted soil, particularly ground watering sites. The amount will be small and very insignificant in comparison to erosion which would occur in the area during flash floods."

Chapter 4, Page 4-35, insert new section after Livestock Grazing:

Soils

"Increased grazing in the Granite Mountain allotment enlargement would cause some increased soil compaction at watering sites and on trails. This would represent a very low percentage of the total surface. Some increased erosion may occur in very localized areas adjacent to the compacted soil, particularly around water sites. The amount will be small and very insignificant in comparison to erosion which would occur in the area during flash floods."

Chapter 4, Page 4-36, Delete text appearing after paragraph 2. Replace with the following:

"Alternative C: Enlarge as a Perennial/Ephemeral Allotment, excluding Bristol and Old Dad Mountains

"Cultural Resources

"Impacts in general would be as described for Amendment 10. This area is a traditional collecting area for the Chemehuevi. In addition, the Mesquite Hills/Crucero ACEC would be subject to impact. This ACEC is already being impacted by vehicle activity spilling over from the Rasor Open Area. Fifty archaeological sites, representing a wide array of site types have been recorded here. Adding or extending pipelines, which would cause surface disturbance, would have severe adverse impacts upon any cultural resources on the line. These impacts would have to be mitigated. Impacts to some sites of significance to Native Americans, such as rock cairns, are not entirely tangible and cannot always be mitigated.

"Wildlife

"The expanded allotment under this alternative would not include significant portions of any bighorn sheep herd. No impacts on bighorn due to livestock grazing would occur if the livestock are kept on the allotment and not allowed to stray into the higher elevations of the Bristol Mountains.

"Livestock Grazing

"Impacts would be as described for alternative A, except that the 1,048 AUM increase would result in a 25 percent increase in operator income."

Chapter 4, Page 4-39, Table 4-4 is revised to incorporate additional wildlife allocations (see revised table).

Chapter 4, Page 4-47, paragraph 2 is revised to read:

Minerals

"A large portion of the area recommended for change is totally devoid of the impacts of mining. One example is WSA 186C, Black Mountain. The large majority of lands impacted by mining within this planning unit are already in Class M. Most of the remainder are in the center of the area proposed for change. If Amendment 2 is accepted, there would be no effect on mineral extraction activities."

Chapter 4, Page 4-52, Add new alternative C analysis presented below, and change No Action to Alternative "D":

"Alternative C: Change Eight Sections Adjacent To Johnson Valley Open Area Only

"Cultural Resources

"Changing the designation from Class L to Class M would allow increased levels of vehicle access and recreational use, both of which would cause increased impacts (or sanction impacts already occurring) to an area of high archaeological and Native American value. This area has a predicted site density of 30 sites per square mile.

TABLE 4-4

ALLOTMENT ALLOCATION DISREGARDING SLOPE AND DISTANCE FROM WATER EXCLUSIONS

	VALLEY WELLS		RUDNICK COMMON		WALKER PASS COMMON		LAST CHANCE		PAHRUMP		JEAN LAKE		GRANITE MOUNTAIN[3]		
Total Survey	Desert Plan	Proposed Amendment 14	Desert Plan	Proposed Amendment 14	Desert	Proposed Amendment 14	Desert Plan	Proposed Amendment 14	Desert Plan	Proposed Amendment 14	Desert Plan	Proposed Amendment 14	Desert Plan	Proposed Amendment 14	Total
Renewable Forage	8798	8798	9222	9222	4791	4791	6981	6981	557	557	301	301	10,959	10,959	
Minus these items:															
-Slope Exclusion 50 - 90%	511		931		272		691		86		4		1,776		
-Distance from Water Exclusion	1264						1952						581		
-Low Production Exclusion	342	342											3,274	3,274	
-Low Condition Class Exclusion	1670	2114	2073	2306	1130	1198	1085	1745	118	139					
- Wildlife Allocation		216		180	21	293	18	96					142	564	
-Wild Horse and Burro Allocation	371	371					180	180							
- Other[3]													1,183	1,183	
- Potential Livestock Forage Allocation	4640	5755	6218	6736	3368	3368	3055	4960	353	418	297	301	4,003	5,938	
-Pre-Desert Plan Allocation	4743	4743	26210	26210	7242	7242	3267	3267	550	550	312	312	4,716	4,716	
-Recommended Livestock Allocation	4640	4743[2]	6218	6736	3368	3368	3055	3267[2]	353	418	297	301	4,003	4,716[2]	
Amendment 14 would Restore These AUMs to Allocation		103		518		0		212		65		4		713	902[3]

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*1 902 AUMs Excluded by Desert Plan for Slope and Distance from Water Consideration (Granite Mountain not included).

[2] Potential Livestock Allocation Greater than Pre-Desert Plan Allocation will not be Authorized until after Monitoring Justifies Under Utilization.

[3] Proposed FY 82 Amendment #13 would Increase AUM Allocation to Pre-Desert Plan Allocation, by Including 1183 AUMs from Kelso Dunes.

"Wildlife

"Impacts to wildlife would be small due to the small size of the area and the large adjoining Class I area. Although the area is used by raptors for foraging, no eyries are known to occur here.

"Livestock Grazing

"No effect on existing Newberry/Ord Allotment. Increased access would result from this amendment to proposed extensions to existing grazing allotment which would result in loss of livestock forage, increased livestock harassment and increased range-improvement vandalism over the long-term.

"Motorized Vehicles

"Opportunities for organized ORV events would be enhanced. The class change recognizes the high level of recreation use that occurs in the area. From a recreation management viewpoint, recreation use levels could be more effectively managed as Class M than Class L. However, the change would result in some minor conflicts between organized ORV users and free-play users. This conflict, however, shall be small in relation to overall use.

Chapter 4, Page 4-56, paragraph 4 is revised to read:

Wildlife

"The area proposed for change overlaps the Chuckwalla Bench ACEC. The ACEC was designated to protect representative, high-value portions of Sonoran Desert ecosystem. At lower elevations within the proposed change, desert tortoise populations are estimated at 100-250 per square mile. The change in multiple-use class will reduce the level of protection within the ACEC and for the desert tortoise."

Chapter 4, Page 4-56, insert new section after Wildlife:

Recreation

"The amendment proposal area is located partially within the Chuckwalla Bench ACEC (#59) and the Chuckwalla Mountains Wilderness Study Area. The Burea's Interim Management Policy generally protects the wilderness values from impairment; the ACEC policies are legally less protective."

"The amendment proposal might indicate a reversal from more protective ACEC management (re: vehicles) to more intensive uses. Dependent upon the results of the route approval process and subsequent use proposals, impacts and activities inconsistent with those requiring ACEC management might result. Such activities could be interpreted as inconsistent with Bureau ACEC policies, particularly if reclassification were not considered in view of the currently developing ACEC management plan."

Chapter 4, Page 4-64, paragraph 3 is revised to read:

Wilderness

"The proposed amendment would result in minor beneficial impacts on the wilderness values of the area by providing legislative, rather than administrative protection. Positive impacts would accrue to the natural condition, opportunities for solitude, primitive and unconfined recreation opportunities, previous recreation uses, and especially to cultural (rock art) values. Designation as wilderness would be a most effective step in protecting this most extensive assemblage of rock art in the Eastern Mojave. ~~However, there could be a management problem in Woods Wash, where alternative sections with large concentrations of saleable yucca are privately owned~~. Should San Bernardino County condition or cease yucca harvesting permits on private lands within the WSA in order to preserve the area's natural conditions, the Bureau's management of the area to provide a wilderness experience would be enhanced."

Chapter 4, Page 4-71, Add new alternative B analysis presented below, and change No Action to alternative "C":

"Alternative B: Change Entire WSA to Non-Suitable, Classes M and L

"Cultural Resources

"Impacts would be similar to those described in Alternative A. However, the potential for damage would be higher since high approximately 4000 acres having cultural resource sensitivity would change from class C to class L.

"Wildlife

"Impacts to wildlife would be similar to those described in Alternative A.

"Wilderness

Alternative B would allow moderate to severe adverse impacts to the wilderness values of the area. Some 52,400 acres previously recommended as suitable would be subject to impacts to natural condition, solitude, primitive and unconfined forms of recreation, scenic values, wildlife and historic and cultural values. A change from a suitable to a nonsuitable recommendation would also adversely affect the adjacent Nevada WSA's suitability for designation as wilderness (Nevada is still in the study phase, with no recommendations yet prepared).

Chapter 4, page 4-84, paragraph 1 is revised to read:

Wildlife

"The proposed change would result in an increase in conflicting uses. Pleasant Canyon contains a major perennial stream ~~with riparian habitat containing an~~

~~excellent overstory of cottonwoods, willows, and mesquite~~. The change to a less preservation-oriented Class would decrease the options available to the West Panamint Mountain Canyons Habitat Management Plan to be prepared for the area. Among the activities with major impacts on wildlife resources are mining and off-road vehicle use. Impacts would consist of increased disturbance to species requiring solitude, such as bighorn sheep and mule deer ~~and destruction of valuable riparian habitat. This riparian habitat is particularly attractive to migrating and breeding birds~~. Also susceptible to impact would be the Panamint alligator lizard, endemic to the northern desert ranges, and the Pacific treefrog, known only in a few desert locales. Several rare mammals could be affected including the Panamint Kangaroo Rat, the Panamint Chipmunk, the pallid bat, and the big brown bat."

Chapter 4, Page 101, "Mitigation" is revised to read:

Mitigation

"The following mitigation measures will be required by BLM under the conditions listed. Table 4-9 presents the impacts requiring mitigation, the mitigation measures, and the effectiveness of that mitigation. In addition, the Bureau will adhere to all legislation and regulations pertinent to its management of CDCA public lands. Such measures which concern Cultural Resources are outlined below."

In areas in which it is anticipated that cultural resources may be impacted as a result of approval of a plan amendment, appropriate inventory will be carried out following the specifications of the Programmatic Memorandum of Agreement between BLM, the State Historic Preservation Office, and the Advisory Council on Historic Preservation. If it is determined that significant cultural resources will be adversely impacted, data recovery plans will be formulated where required.

The cultural resource inventory will include contacting appropriate Native American groups/individuals to determine possible impacts to areas of significance to Native Americans.

Chapter 4, Page 102, Table 4-9 has been revised; see next page.

Literature Cited, Page LC-6, add:

"_______ 1979. Interim Management Policy and Guidelines for Lands Under Wilderness Review."

Appendix A, Maps of Amendments 5, 12, 18, 20, 22, and 47, have been revised and are included on the following pages.

Appendix B, Maps 10 and 11, have been revised and are included on the following pages.

Table 4-9
Mitigation Measures

Amendment	Impact	Mitigation	Effectiveness of Mitigation
5	Degradation of wilderness, wildlife, and cultural resource values from lack of enforcement of controls on off-road vehicle use. Adjacent wilderness would not be manageable.	An enforcement plan will be developed at time of implementation. BLM would solicit suggestions, which could include a free use permit system, cooperative management and support by recognized volunteer groups.	Will curtail "spillover" impacts into adjacent Class C areas, and improve wilderness manageability. Will not prevent serious impact on cultural resources or wildlife.
6	The following cultural sites, which will require National Register documentation, are directly on race course and would be subject to high direct impacts from Barstow-to-Vegas race: 4-SBr-2154 4-SBr-2219 4-SBr-2220 4-SBr-2161 CA-069-152 CA-069-153	Site collection. Clearly mark course with line and flagging. In addition, for CA-069-152, cordon off site during race. Station checkpoint at course turn near site. For CA-069-153, flag area which is off-limits to spectators. Station monitors at pit areas.	Race participant compliance would prevent site damage. Site information content salvaged.
6	Cultural site 4-SBr-3174 lies between the access road the the spectator area and could suffer high direct impact.	Site collection.	Site information content salvaged.
6	Petroglyphs, pottery, and lithics at Halloran Spring off-ramp may suffer medium indirect impacts from spectators entering spring area.	Post spring area and patrol.	Site damage prevented.

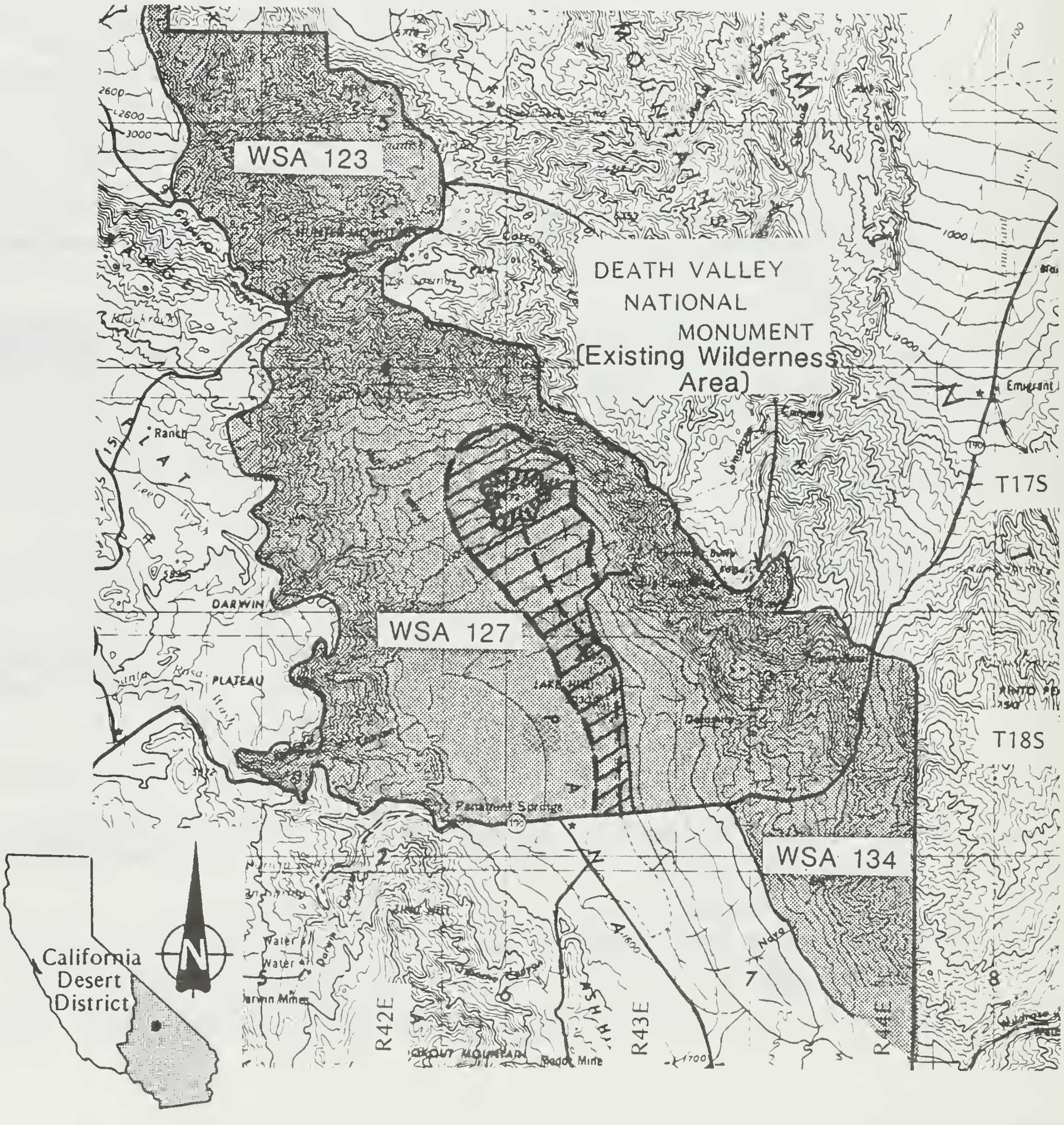
Amendment 5
PANAMINT DUNES
(WSA 127)

▨ Alternative A
Change from "Closed" to "Open"

▭ Alternative B
Change from ""Closed" to "Open"

x Camping area

- - - Designated Access Route



Amendment 6

BARSTOW TO VEGAS Race Course

Establish a point-to-point race course

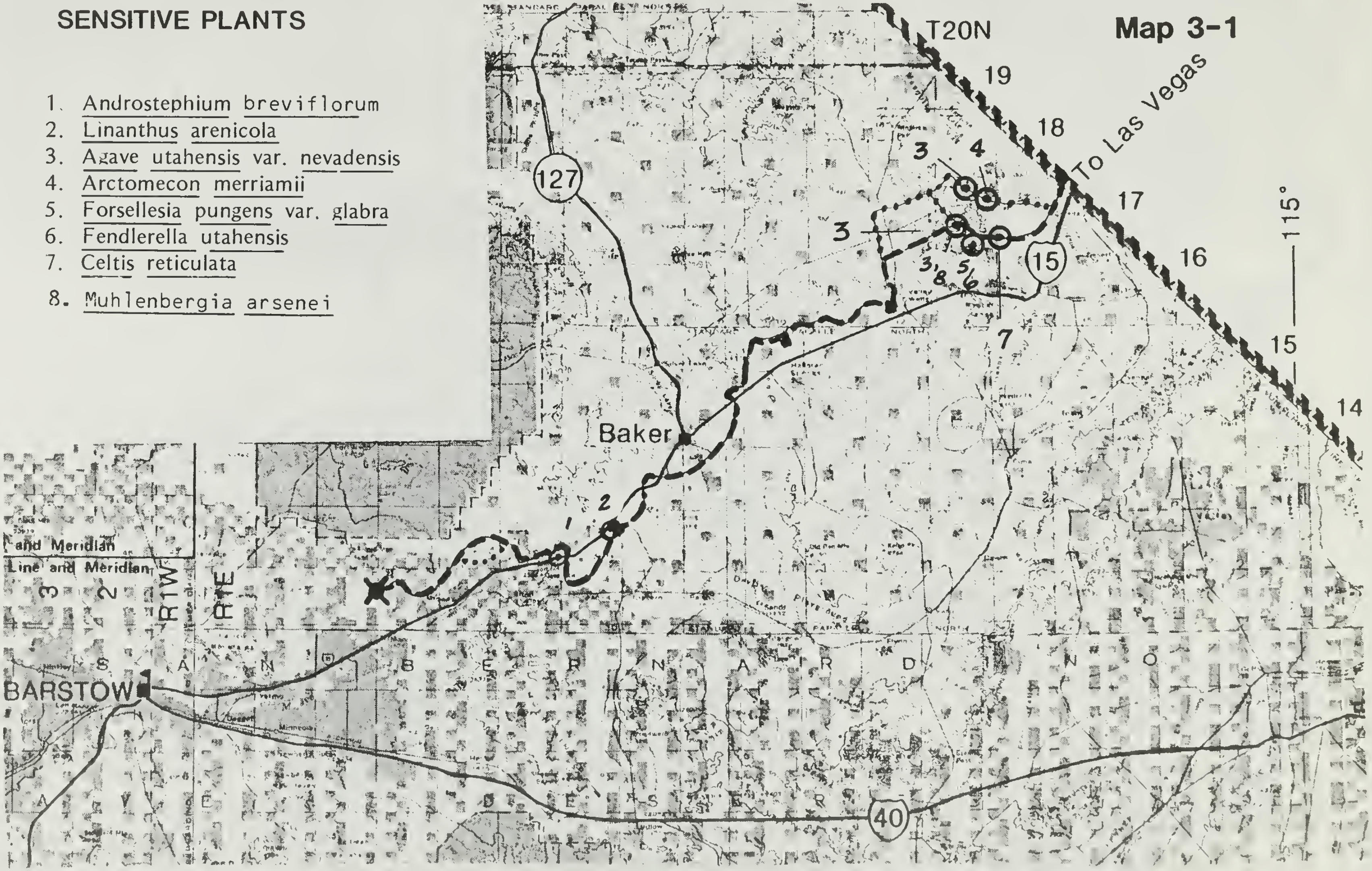
Map 3-1

VEGETATION RESOURCES

- - - - MAIN ROUTE
• • • • • • OPTIONAL ROUTE
■ PIT AREA
✖ START AREA

SENSITIVE PLANTS

1. *Androstephium breviflorum*
2. *Linanthus arenicola*
3. *Agave utahensis* var. *nevadensis*
4. *Arctomecon merriamii*
5. *Forsellesia pungens* var. *glabra*
6. *Fendlerella utahensis*
7. *Celtis reticulata*
8. *Muhlenbergia arsenei*



VEGETATION RESOURCES

Amendment 6

BARSTOW TO VEGAS Race Course

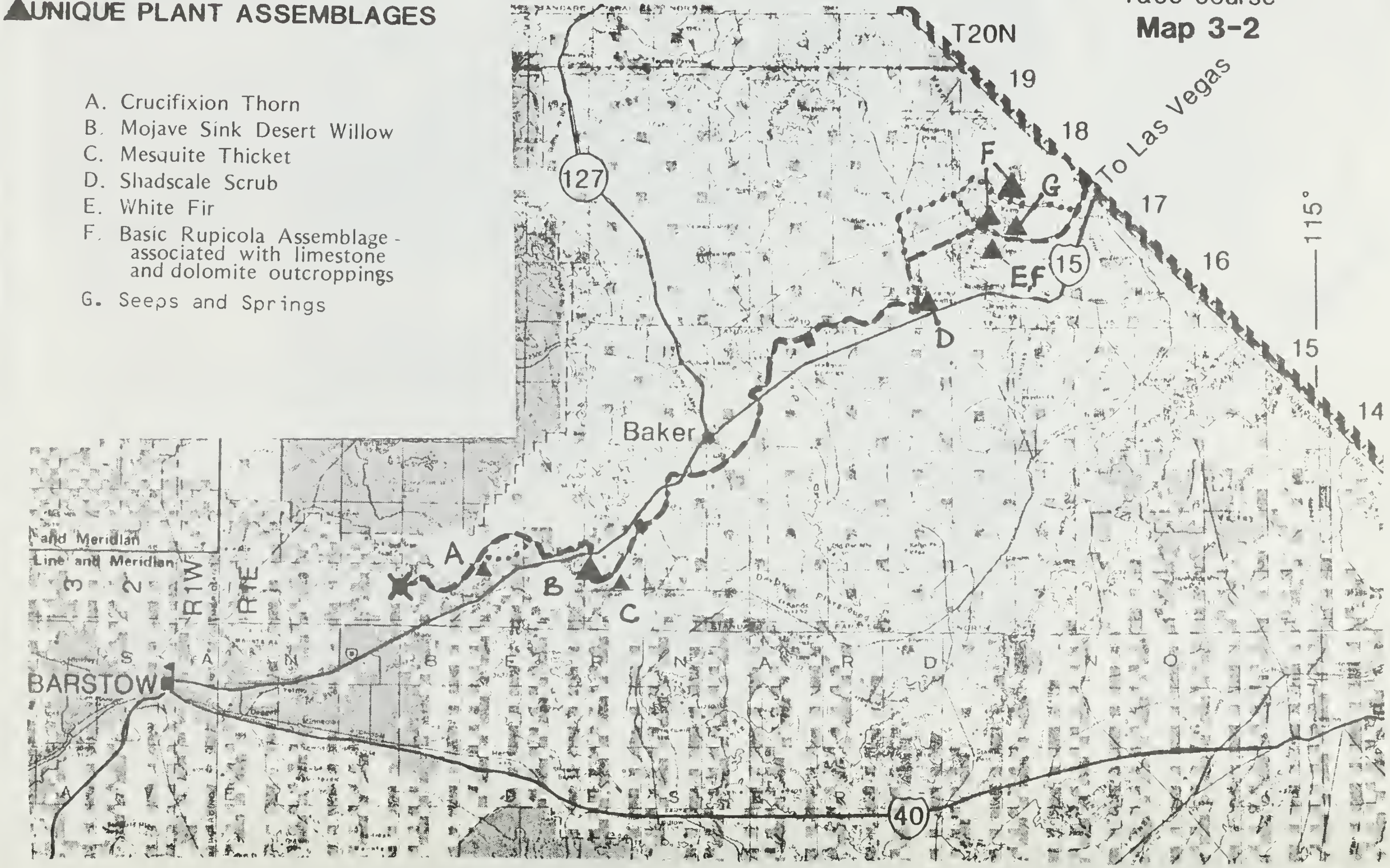
Establish a point-to-point race course

Map 3-2

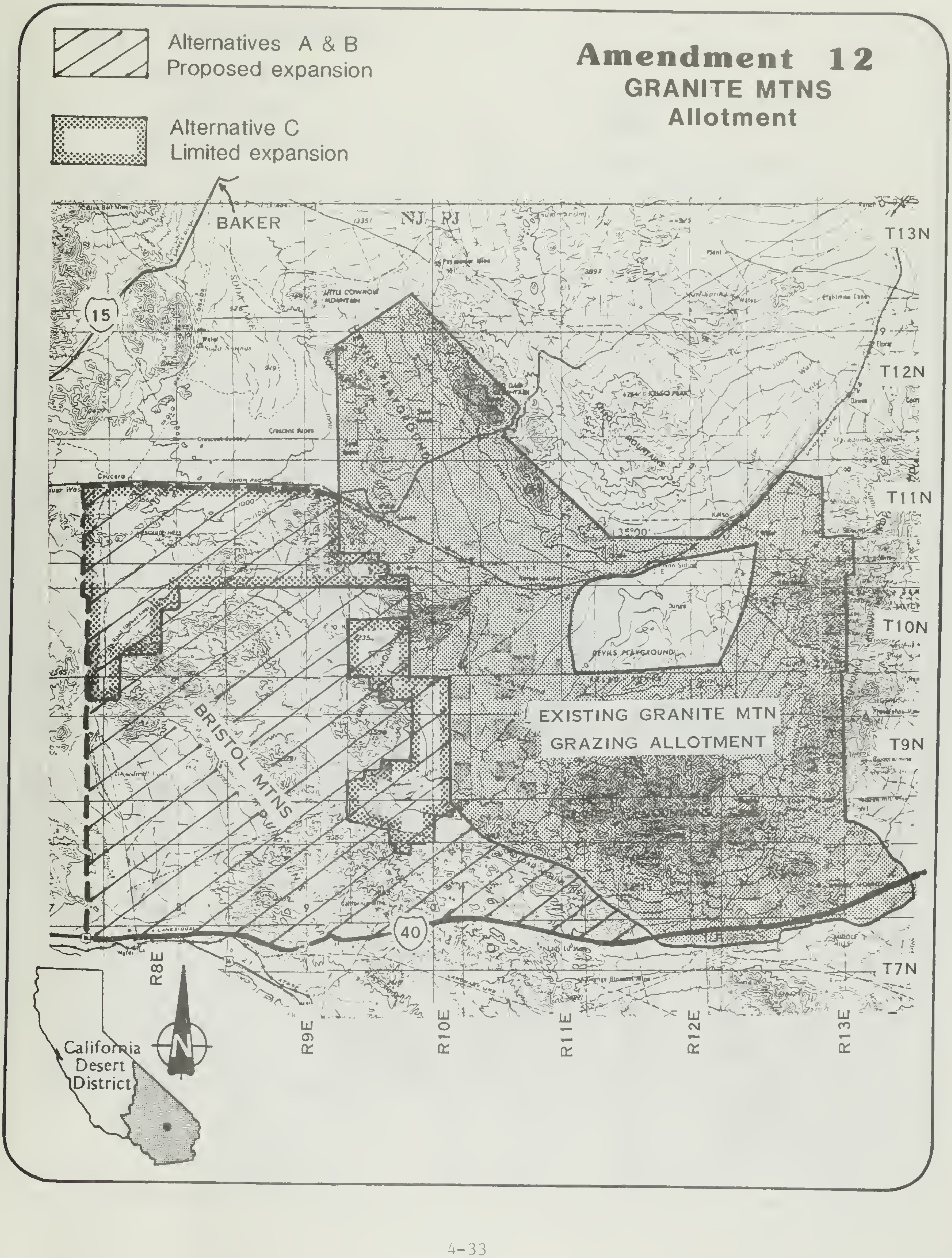
- - - - MAIN ROUTE
•••••• OPTIONAL ROUTE
■ PIT AREA
✕ START AREA

▲UNIQUE PLANT ASSEMBLAGES

A. Crucifixion Thorn
B. Mojave Sink Desert Willow
C. Mesquite Thicket
D. Shadscale Scrub
E. White Fir
F. Basic Rupicola Assemblage - associated with limestone and dolomite outcroppings
G. Seeps and Springs



Amendment 12
GRANITE MTNS Allotment



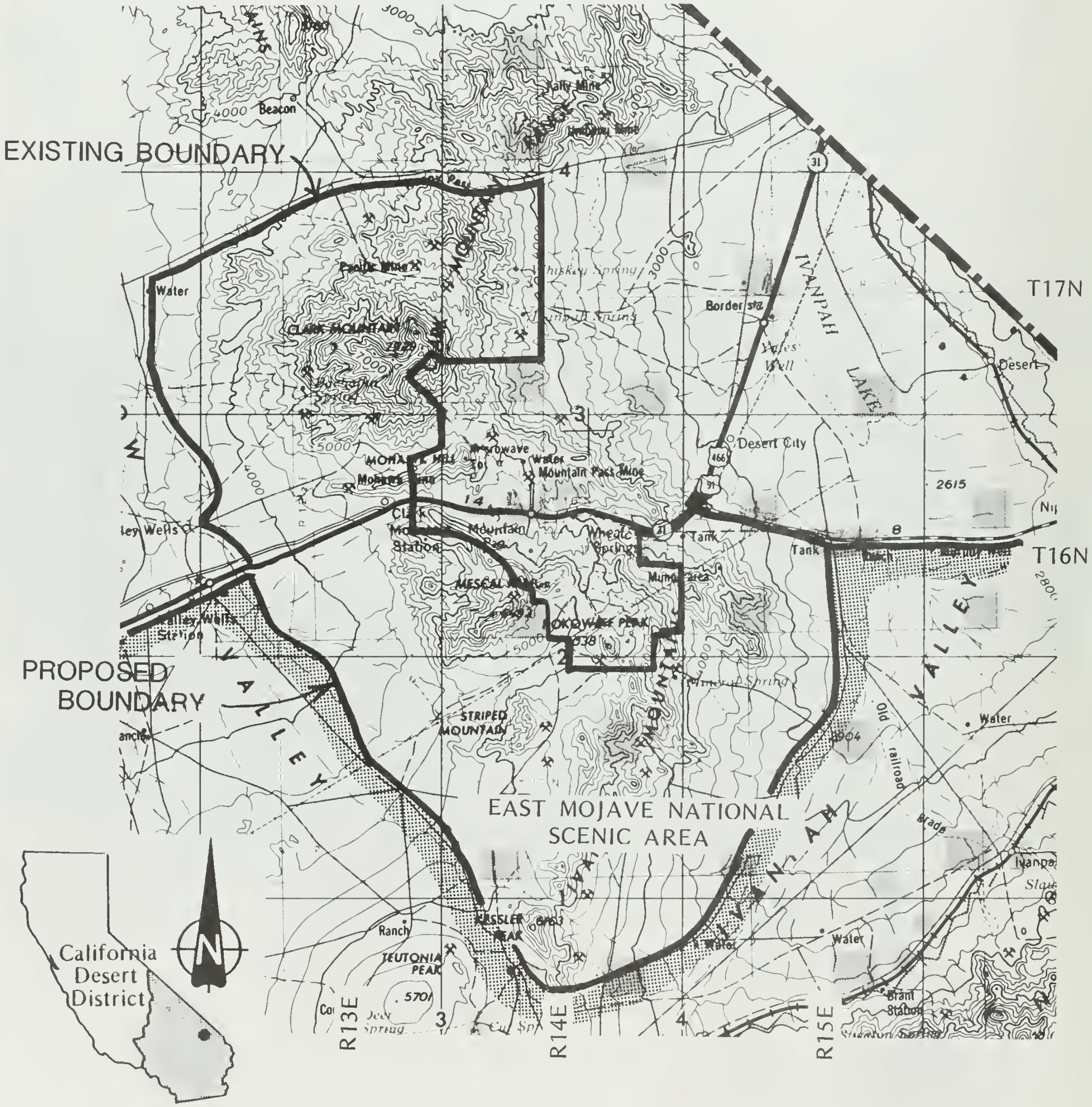
Amendment 18

EAST MOJAVE NATIONAL SCENIC AREA

Alternative A ▨

Alternative B ▬

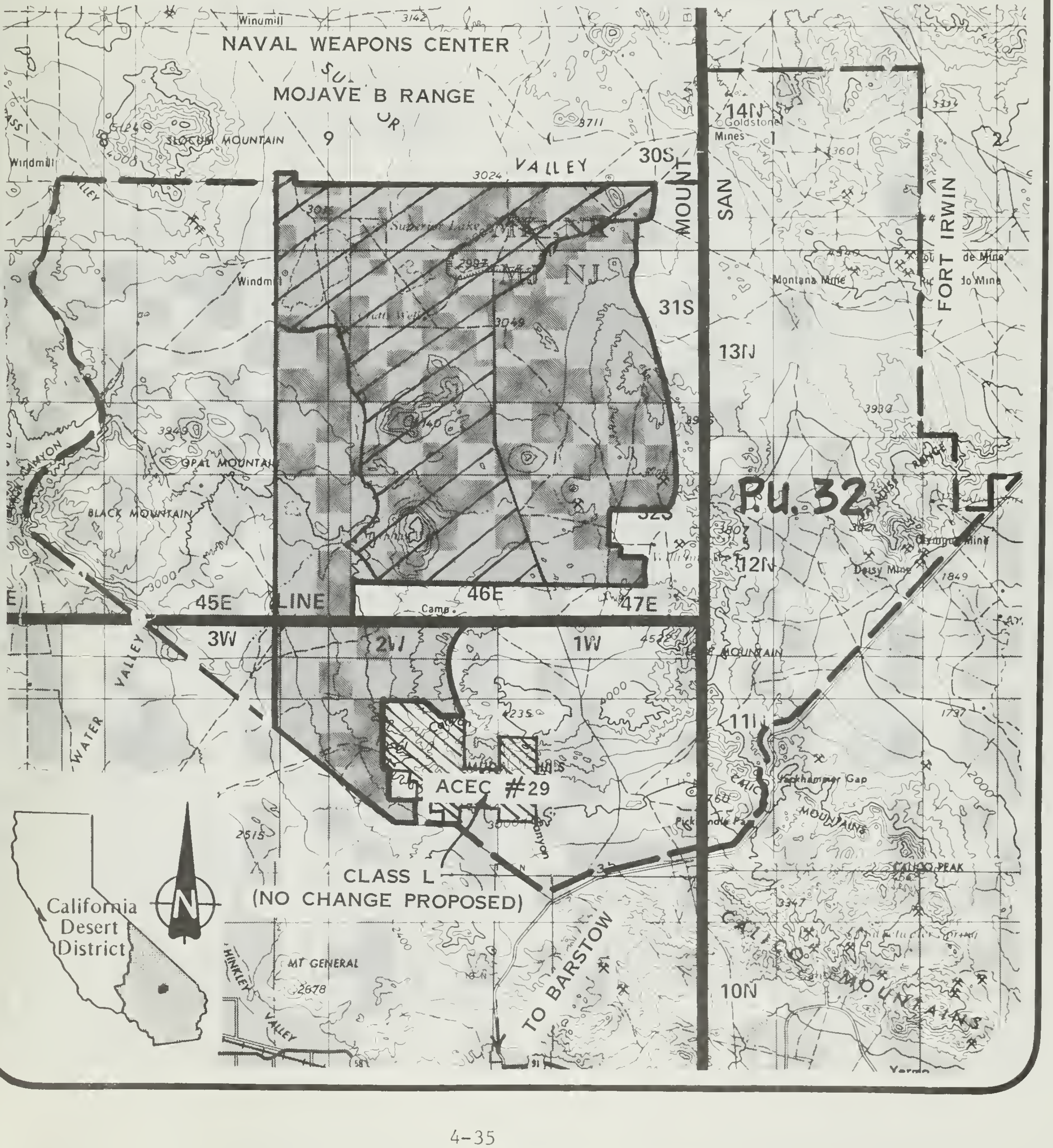
Change northern boundary of EMNSA



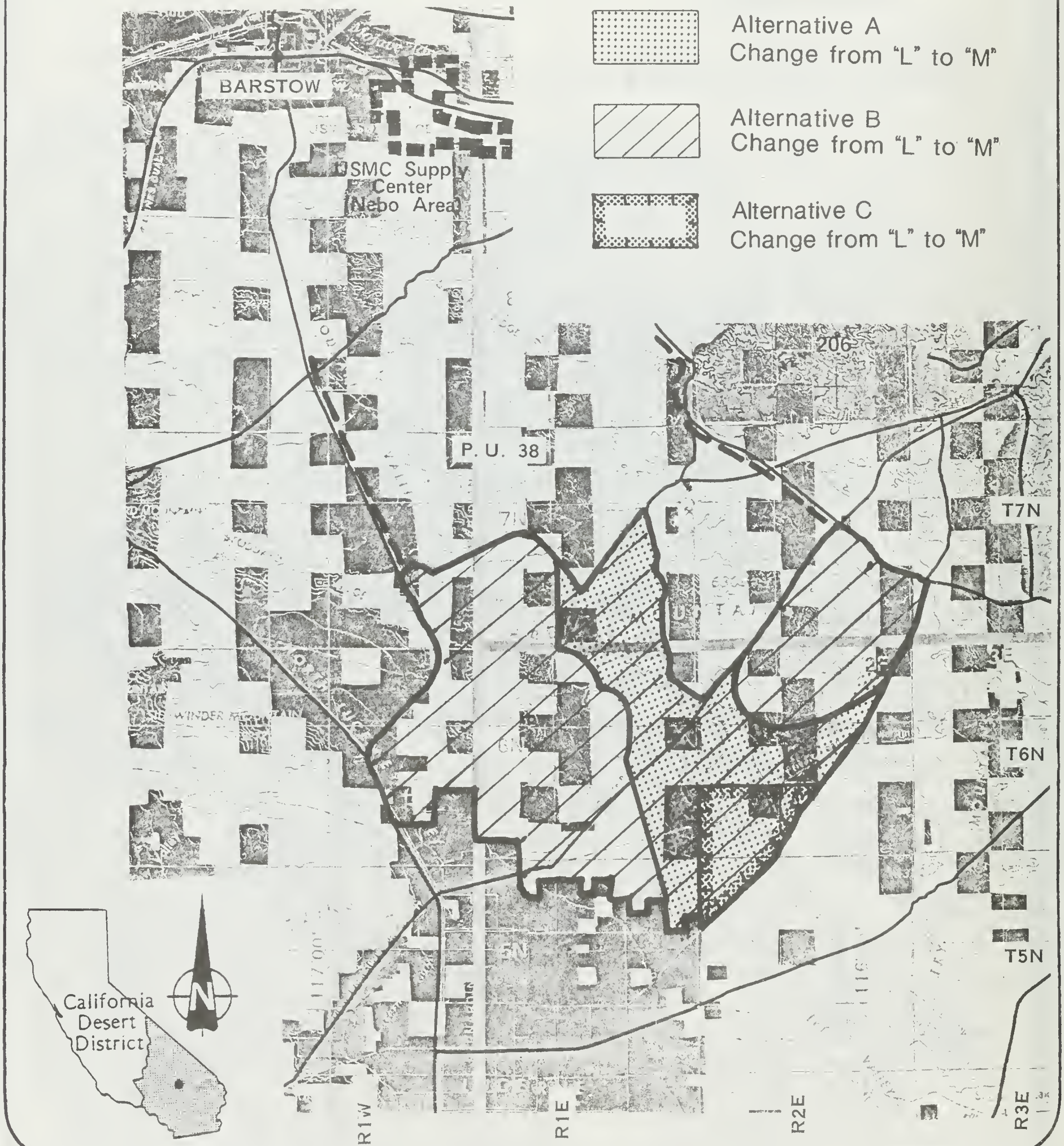
Amendment 20
PLANNING UNIT 32

░ Alternative A
Change from “L” to “M”

▨ Alternative B
Change from “L” to “M”



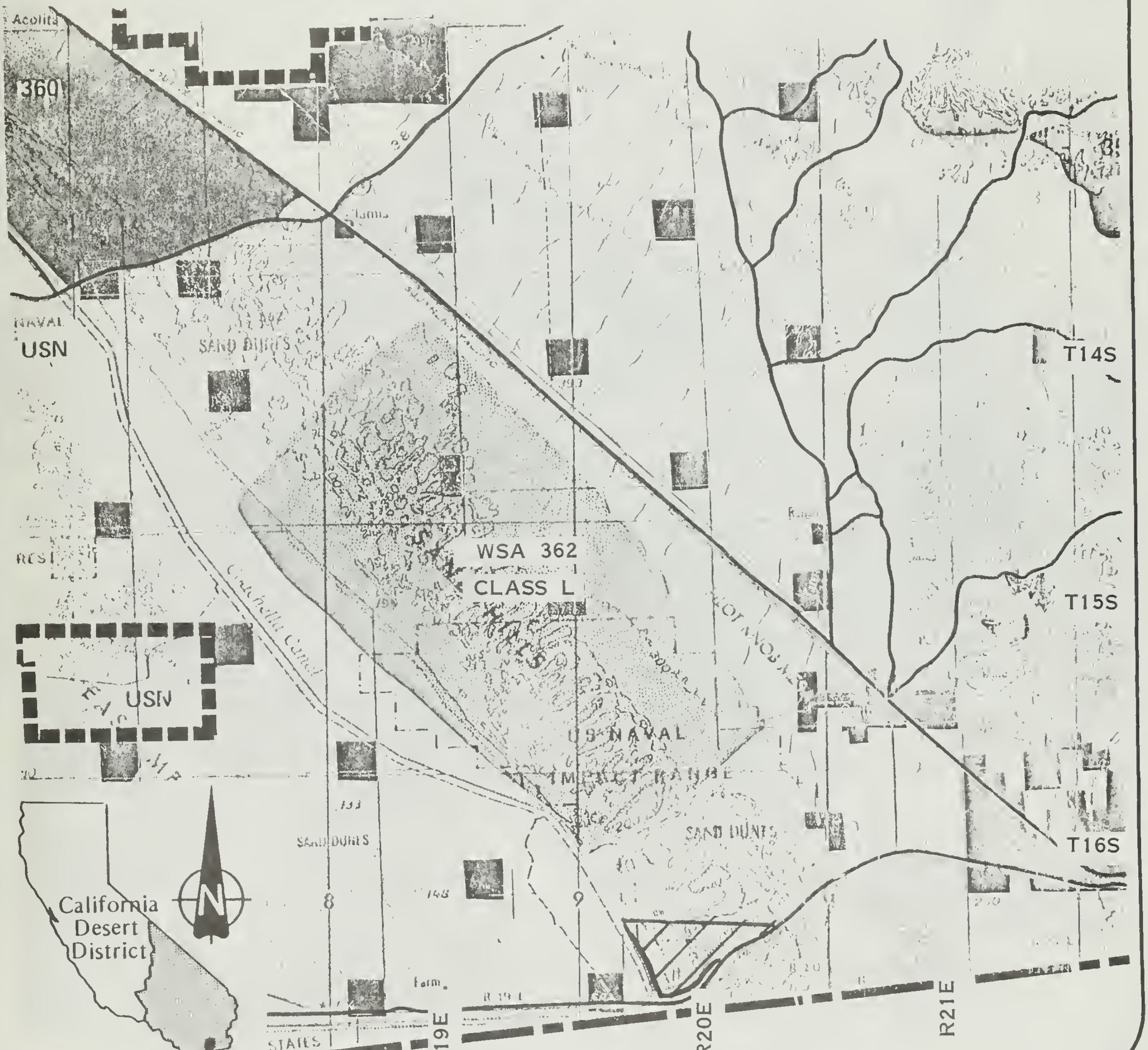
Amendment 22
PLANNING UNIT 38
STODDARD EAST



Amendment 26

GORDON'S WELL
(Imperial Dunes)

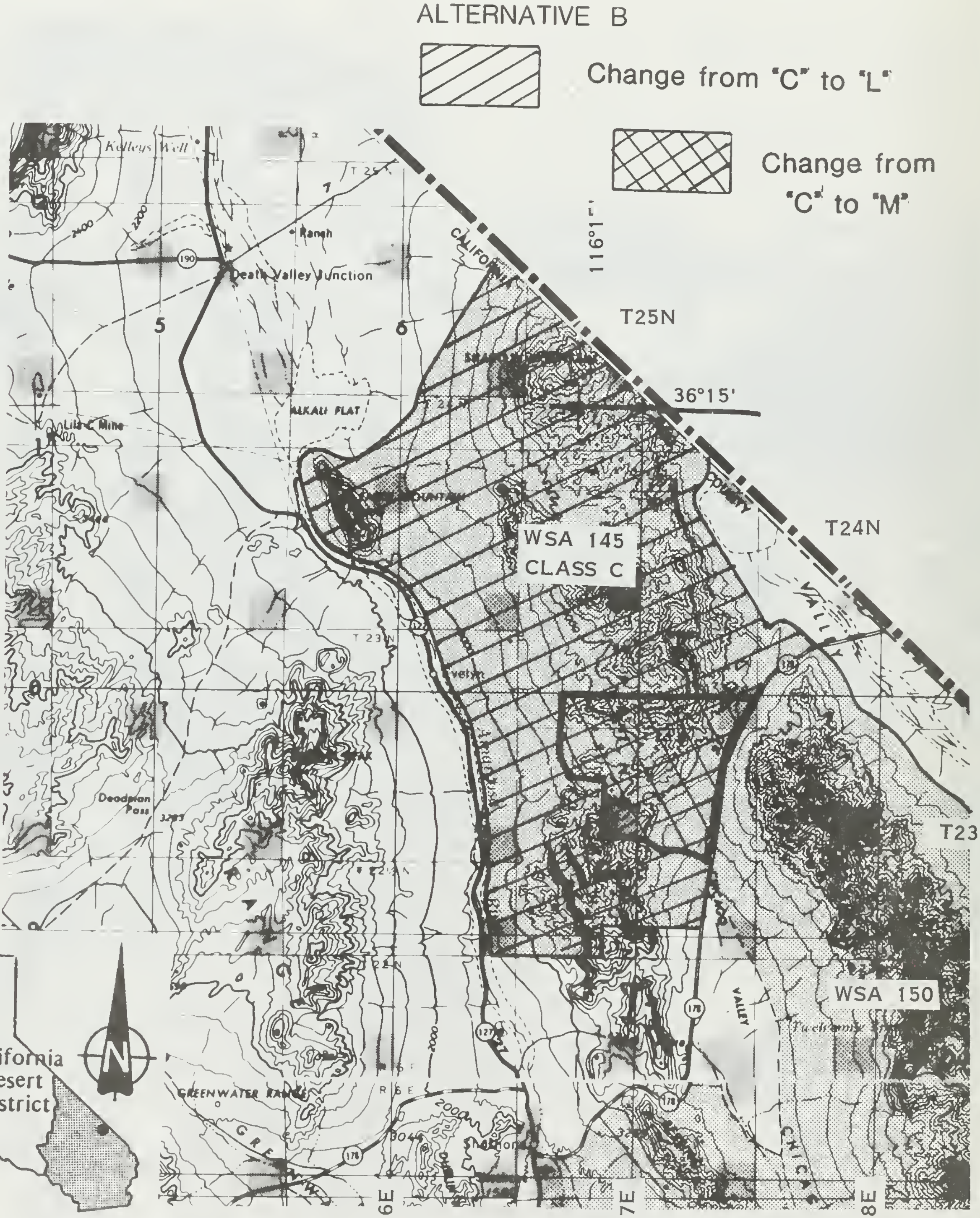
▨ Change from "L" to "I"



Amendment 39

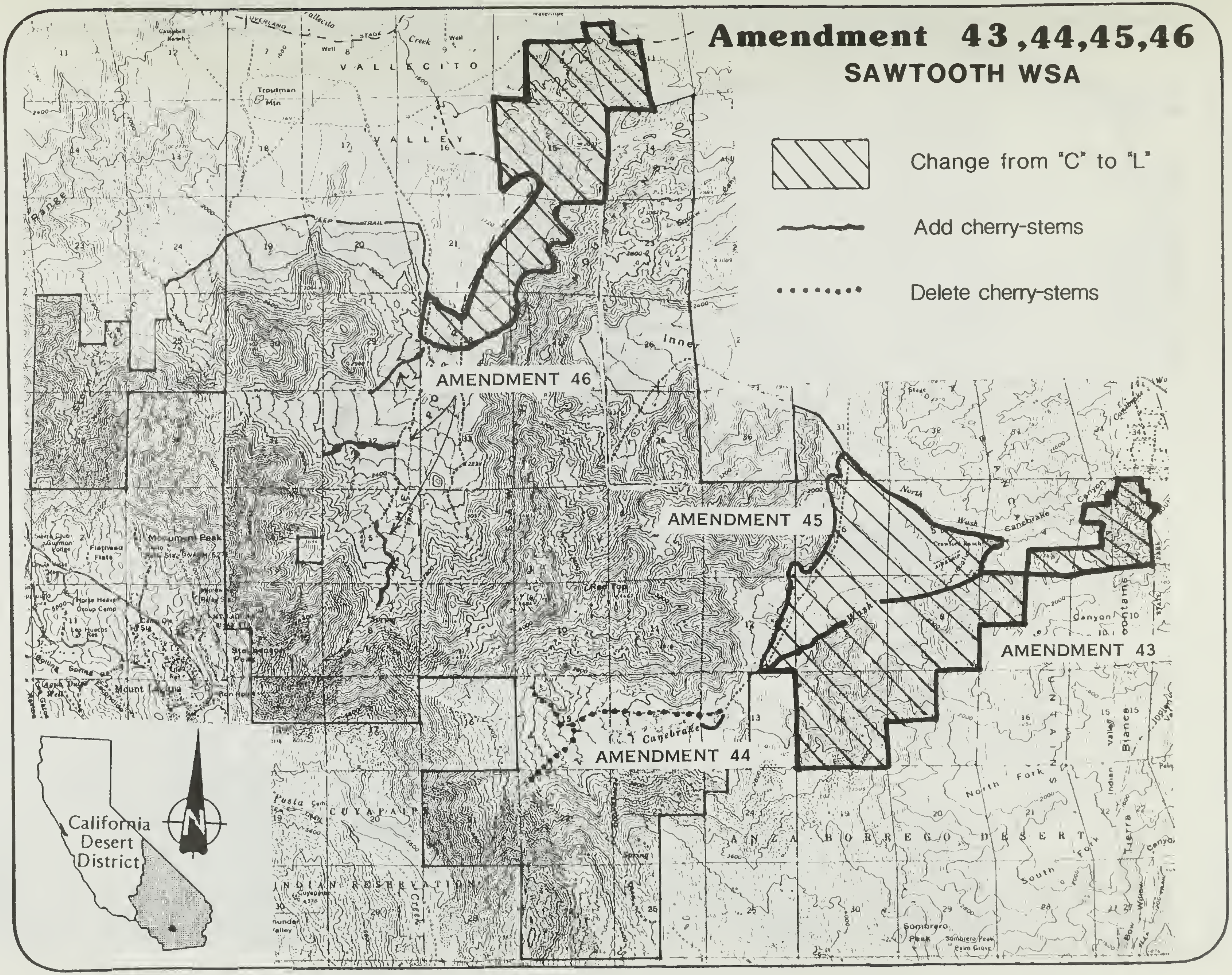
WSA 145

Resting Springs Range



Amendment 43,44,45,46

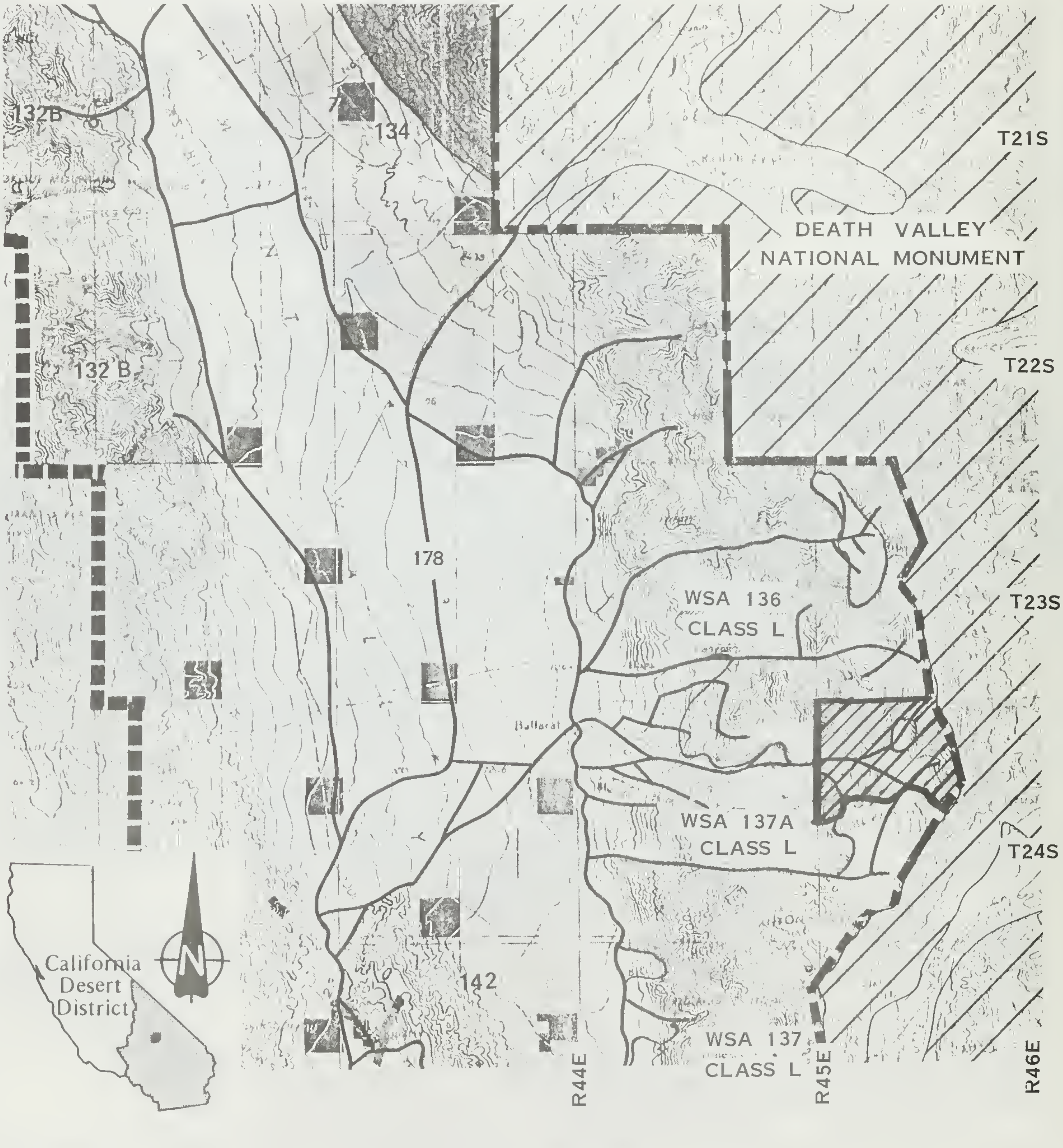
SAWTOOTH WSA



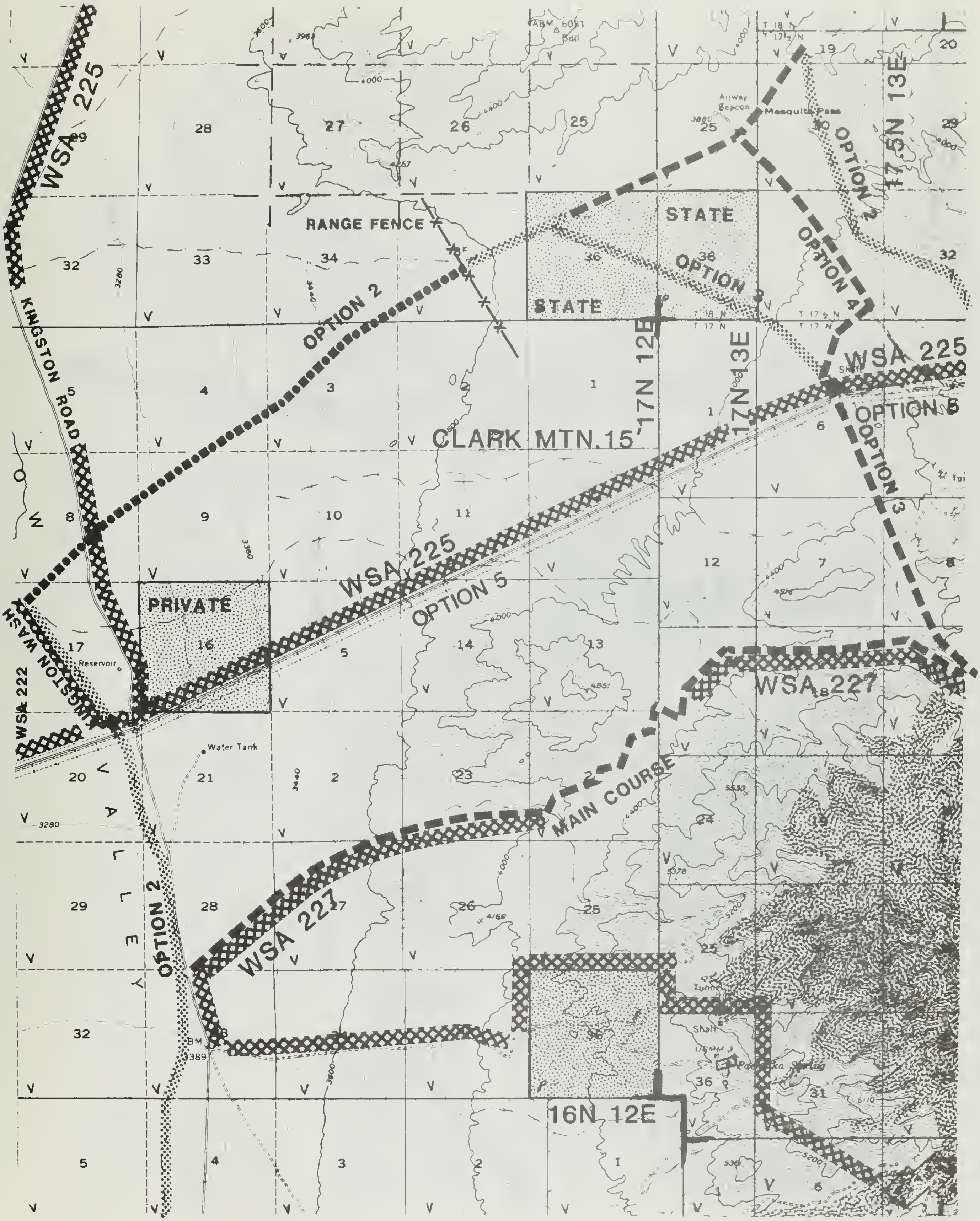
Amendment 47

PLEASANT CANYON

▨ Change from "L" to "M"



B-V MAP **10**


WSA 225
WSA 225
WSA 225
RANGE FENCE
STATE
STATE
OPTION 2
OPTION 2
OPTION 2
OPTION 3
OPTION 3
OPTION 4
OPTION 5
OPTION 5
KINGSTON ROAD
KINGSTON WASH
CLARK MTN. 15'
17N 12E
17N 13E
17.5N 13E
T 18 N
T 17½ N
T 17 N
PRIVATE
WSA 222
WSA 227
WSA 227
MAIN COURSE
VALLEY
16N 12E
Airway Beacon
Mesquite Pass
Reservoir
Water Tank
Shaft
Pachalka Spring
BM 3389
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20
29
32
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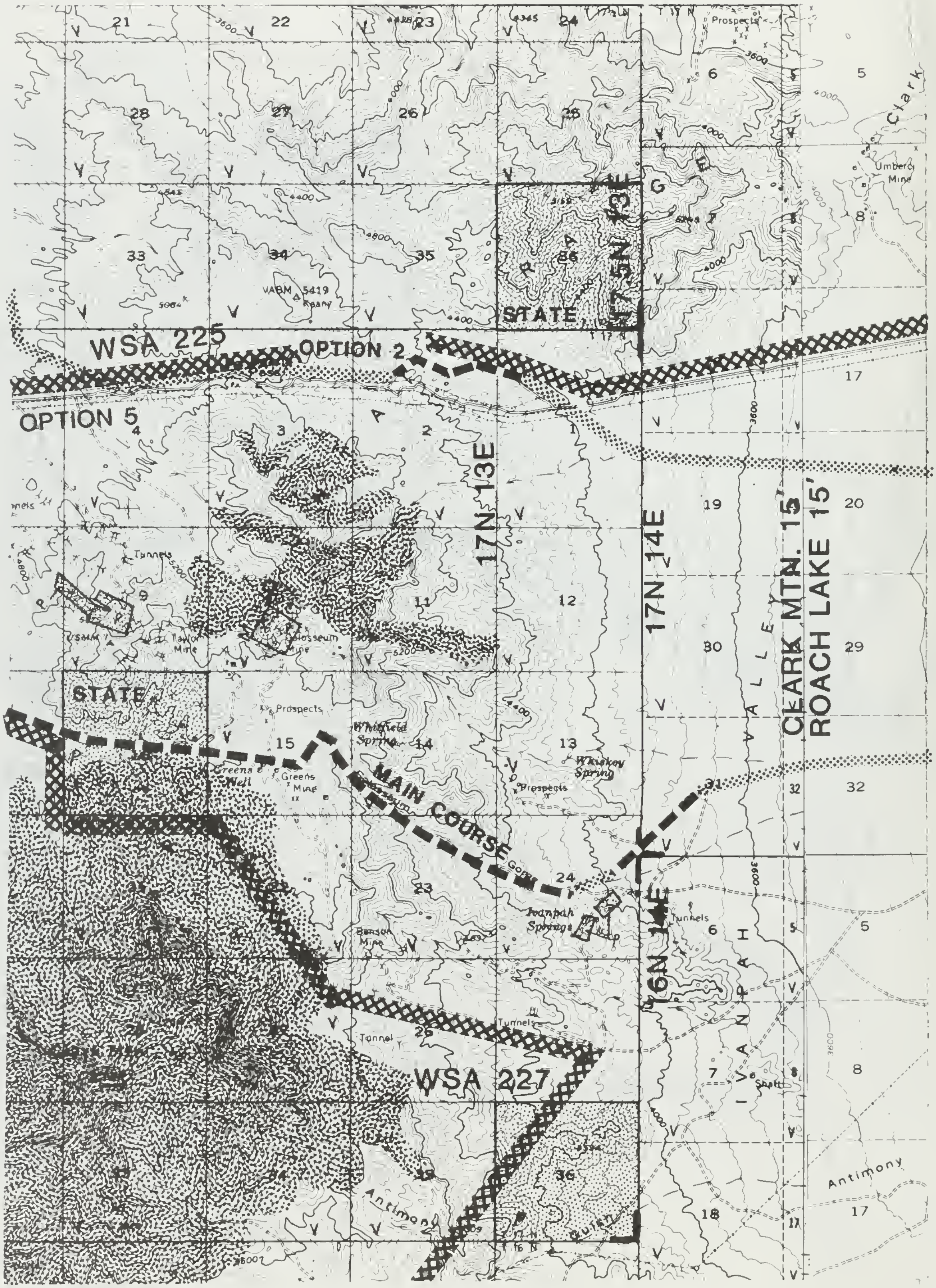
B-V MAP 11


21
22
23
24
Prospects
6
5
Clark
28
27
26
25
Umberci Mine
33
34
35
36
VABM 5419
STATE
17N 13E
WSA 225
OPTION 2
OPTION 5
17
4
3
2
1
17N 13E
19
20
17N 14E
CLARK MTN. 15'
ROACH LAKE 15'
Tunnels
9
Taylor Mine
Colosseum Mine
11
12
30
29
STATE
Prospects
15
Whitfield Spring
14
13
Whiskey Spring
Prospects
Greens Well
Greens Mine
MAIN COURSE
31
32
32
24
23
Ivanpah Springs
Benson Mine
Tunnels
6
5
16N 14E
IVANPAH
VALLEY
Tunnel
26
Tunnels
WSA 227
7
Shaft
8
36
Antimony
Gulch
18
17
Antimony

Appendix C, Amendment Two is revised to read as follows:

AMENDMENT TWO:
MULTIPLE-USE CLASS GUIDELINES CHANGES FOR G-E-M (Gems-Energy-Minerals) Resources.
Changes proposed for the MUC Guidelines in response to modifications of the Bureau 3809 regulations and to requests that guidelines for geothermal power plants and for vehicular access for mineral exploration and development be the same in Classes L and M.

MULTIPLE-USE CLASS GUIDELINES

	MULTIPLE-USE CLASS C Controlled Use (Wilderness Management) (Note: Class C identifies areas "preliminarily recommended" for wilderness designation by Congress. These guidelines summarize the kinds of management likely to be used in these areas after formal designation of wilderness by Congress.)	MULTIPLE-USE CLASS L Limited Use	MULTIPLE-USE CLASS M Moderate Use	MULTIPLE-USE CLASS I Intensive Use
4 CULTURAL AND PALEONTOLOGICAL RESOURCES	Archaeological and paleontological values will be preserved and protected. Procedures described in 36 CFR 800 will be observed where applicable. A Memorandum of Agreement has been signed by the BLM, the California State Historic Preservation Officer, and for cultural resources the President's Advisory Council on Historic Preservation to protect cultural resource values.			
5 NATIVE AMERICAN VALUES	Native American cultural and religious values will be preserved where relevant and protected where applicable. Native American group(s) shall be consulted. Memorandums of Agreement and Understanding have been signed between BLM and the Native American Heritage Commission pertaining to Native American concerns and cultural resources.			
6 ELECTRICAL GENERATION FACILITIES	Electrical generation plants are not allowed	Electrical generation plants may be allowed (See wind solar, geothermal, below.)	All types of electrical generation plants may be allowed in accordance with State, Federal, and local laws	
		Existing facilities may be maintained and upgraded or improved in accordance with special-use permits or by amendments to rights-of-way		
—Nuclear and Fossil Fuel Powerplants	Not allowed.		May be allowed in accordance with Federal, State, and local laws	
—Wind/Solar Powerplants	Not allowed.	May be allowed after NEPA requirements are met		
—Geothermal Powerplants	Not allowed	~~May be allowed pursuant to licenses issued under 43 CFR Section 3250, et seq. An EIS will be required.~~	May be allowed pursuant to licenses issued under 43 CFR Section 3250, et seq. NEPA requirements will be met.	

Table 1.—*Multiple-Use Class Guidelines*—Continued

	MULTIPLE-USE CLASS C Controlled Use (Wilderness Management)	MULTIPLE-USE CLASS L Limited Use	MULTIPLE-USE CLASS M Moderate Use	MULTIPLE-USE CLASS I Intensive Use
13. MINERAL EXPLORATION AND DEVELOPMENT	These guidelines summarize the kinds of management likely to be used after formal designation of wilderness by Congress. Congressional enactment of wilderness will prescribe mining rules and possible cutoff dates for mineral entry. The information below indicates the possible restrictions after enactment. The following summarizes possible significant provisions of the Wilderness Act as it applies to mineral exploration and development after Congress officially designates the areas as wilderness. (For more detailed information, see the G-E-M Element or the Wilderness Act of Sept. 3, 1964). Minerals Prospecting and Exploration: Prospecting and exploration for the purpose of gathering information about mineral resources is allowed, provided such activity is carried on in a manner compatible with the preservation of the wilderness environment. Mineral Development: All designated wilderness areas may be withdrawn from mineral entry at sometime subsequent to Congressional designation. Following withdrawal, *no new mining claims* may be located, and no new permits, leases, or material sales contracts may be issued subject to deadlines established by Congress. Valid existing mining operations may continue pursuant to submission and approval of operational plans which will prevent unnecessary or undue degradation of wilderness qualities.	*Leasable Minerals* ~~Except as provided in Appendix 5.4, 516 DM 6, NEPA Procedures titled "Categorical Exclusions," prior to issuing any mineral leases, an environmental assessment will be prepared on the proposed mineral leasing action. As this class is an area of significant public concern, 60 days' public comment will be provided on the EA. An EIS will be prepared if the proposal would significantly impact the quality of the human environment and this should be expected in areas of especially sensitive surface resources. Mitigation measures as appropriate, subject to technical, ecological, wildlife, vegetation, and cultural values.~~ ~~Prior to any operations upon mineral leases, the operator shall submit the appropriate notices or applications to BLM or the U.S. Geological Survey (USGS), as appropriate, as specified in 43 CFR 3100, 3200, 3500.~~ ~~All applications submitted to the USGS shall be treated under existing joint BLM/USGS procedures (i.e., S.O. 2948) and other applicable regulations. Reclamation requirements are contained within these procedures.~~ Locatable Minerals ~~NEPA requirements will be met.~~ ~~BLM will review plans of operations for potential impacts on sensitive resources identified on lands in this class. Mitigation, subject to technical and economic feasibility, will be required. A 30-day public review period will be provided for mining plans not within an Area of Critical Environmental Concern (ACEC). For those mining plans that fall within an ACEC, a longer public comment period, depending upon the nature of the action proposed, may be required.~~	*Leasable Minerals* Except as provided in Appendix 5.4, 516 DM 6, NEPA Procedures titled "Categorical Exclusions," prior to issuing any mineral leases, an EA will be prepared on the proposed leasing action. Mitigation measures will be required to protect sensitive scenic, ecological, wildlife, vegetative, and cultural values. Prior to any operations upon mineral leases, the operator shall submit the appropriate notices or applications to BLM or the U.S. Geological Survey (USGS), as appropriate, as specified in 43 CFR 3100, 3200, 3500. All applications submitted to the USGS shall be treated under existing joint BLM/USGS procedures (i.e., S.O. 2948) and other applicable regulations. Reclamation requirements are contained within these procedures. *Locatable Minerals* Location of mining claims is nondiscretionary. Operations on mining claims are subject to the 43 CFR 3809 Regulations and applicable State and local law. ~~In most instances, plans of operations shall be required and treated as specified in the above regulation.~~ NEPA requirements will be met. BLM will review plans of operations for potential impacts on sensitive resources identified on lands in this class. Mitigation, subject to technical and economic feasibility, will be required.	

		Saleable Minerals ~~Except as provided in Appendix 5.4, 516 DM 6, NEPA procedures titled "Categorical Exclusions," an EA shall be required for materials sales locations, including sand and gravel sites. Depending on the sensitivity of the area, the District Manager may choose to extend the normal public review period.~~	*Saleable Minerals* Except as provided in Appendix 5.4, 516 DM 6, NEPA Procedures titled "Categorical Exclusions," new material sales locations, including sand and gravel sites, will require an EA.	
		Continued use of existing areas of sand and gravel extractions is allowed subject to BLM permits, as specified in 43 CFR 3600.		
14. MOTORIZED-VEHICLE ACCESS/ TRANSPORTATION	Motorized-vehicle use is generally not allowed unless provided for in individual wilderness legislation and management plans or if necessary to serve valid existing rights, and for emergency use for public safety, or protection of wilderness values	New roads and ways may be developed under right-of-way grants or pursuant to regulations or approved plans of operation. Motorized-vehicle use is allowed on "approved" routes of travel. This means that "existing" routes of travel are closed unless specifically designated "open."	Motorized-vehicle use will be allowed on "existing" routes of travel unless designated closed by the authorized officer. New routes may be allowed upon approval of the authorized officer.	Same as Class M. In addition, the vehicle open areas are available for unrestricted vehicle access (see Recreation Element).
		Vehicle use on some major dunes and dry lakebeds may be allowed (see Motorized-Vehicle Access Element)		
		Periodic or seasonal closure of routes of travel may be required.		
		Access will be provided for mineral exploration and development		
	Compliance with Executive Orders 11644 and 11989 as applied to motorized-vehicle access will be assured			
—Railroads	No new railroads and trams will be allowed. Existing railroads and trams may be operated and maintained subject to nonimpairment of wilderness values.	Railroads and trams may be allowed to serve authorized uses if no other viable alternative is possible.	Railroads and trams may be allowed.	
—Aircraft	Aircraft facilities are not allowed.	Temporary landing strips may be allowed by permit	Airports and landing strips may be allowed by lease subject to conformance with county or regional airport plans and FAA and DOD approval.	
15 RECREATION	This class is suitable for nonmechanical types of recreational experience which generally involve low to very low user densities. Recreational opportunities provided include, but are not limited to, the following characteristic activities: —backpacking —primitive, unimproved site camping —hiking —horseback riding —rockhounding	This class is suitable for recreation which generally involves low to moderate user densities. Recreation opportunities include those permitted in Class C plus: –land-sailing on dry lakes –non-competitive vehicle touring and events only on "approved" routes of travel All organized vehicle events, competitive or not, require a permit specifying the conditions of use;	This class is suitable for a wide range of recreation activities which may involve moderate to high user densities. Recreational opportunities include those permitted in Class L. Competitive motorized-vehicle events are limited to "existing" routes of travel and must be approved by the authorized officer. Pit, start, and finish areas must be designated by the authorized officer. All competitive events and organized events having 50 or more vehicles require permits.	This class is suitable for recreation activities which generally involve high user densities. A wide array of recreational opportunities will be found in this class. Off-road-vehicle play will be allowed where approved in open areas. Uses permitted are the same as Class M, in addition, motorized-vehicle play is allowed in areas designated "open." All aspects of competitive events will be permitted ex-

Appendix C, Amendment 3, is revised to read as follows:

AMENDMENT THREE:
REVISE MOTORIZED VEHICLE ACCESS ELEMENT

In the period following Plan approval at the end of 1980, substantial problems surfaced in implementation of the rules for vehicle access. Major issues were the route designation process, particularly and its unrealistic schedule, and the definition of "existing routes of travel," which relied on aerial photographs which many claimed were unavailable or non-existent. Many individuals and organizations, including both conservationists and vehicle recreationists, wanted clarification of the rules and a speeding-up of route approval in areas of major concern. They were joined by Bureau recreation specialists who found that the vehicle access element needed considerable improvement as a management tool.

The revised Motorized Vehicle Element presented here is the result of a cooperative effort of conservationists, motorized vehicle users, the Multiple-Use Advisory Council, and the Bureau staff to produce an element which would be acceptable to all proponents and which would be an instrument for achieving the goals of the California Desert Plan.

*MOTORIZED VEHICLE ACCESS ELEMENT

Other than those who are simply crossing it, most users of the desert travel some of the time on its network of maintained gravel and dirt roads, ways, trails, and accessible desert washes. There are many of these "routes of travel" in the CDCA.

According to one study, the CDCA has 15,000 miles of paved and maintained roads, 21,000 miles of unmaintained dirt roads, and 7,000 miles of vehicle-accessible washes. However, these routes are not evenly distributed, and desert topography and vegetation do not prevent, and sometimes[1] encourage, cross-country travel in motorized vehicles. Desert soils and vegetation retain the marks of this kind of travel for many years, except in a few places where occasional rains, windstorms, and flash floods erase them. Thus, one vehicle traveling cross-country can create a new route of travel. The proliferation of roads and trails in the CDCA has resulted in a serious problem in some areas and provides the most difficult management issue for BLM and the public.

Many of the Desert's loveliest and most fragile resources can only be enjoyed by use of vehicle access routes, but these resources are quickly destroyed if vehicles travel everywhere. Most people who go to the desert revel in its spaciousness and the feeling of solitude and freedom it provides. However,

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* Underlines indicate changes from the Desert Plan

growing numbers of vehicles and uncontrolled expansion of this network of roads and trails may damage this solitude, and heavy-handed regulations to control this traffic would certainly affect the sense of freedom.

The question of managing access to the desert is especially sensitive. Vehicle access is confused with the use of vehicles for play ~~as well as for gaining access for dunebuggies, motorcycles, and some four-wheel drive vehicles classified by some under the general heading of "ORVs."~~ Public comments make it clear that motorized - vehicle access and off-highway vehicle play need to be clearly separated and managed differently. To this end, management direction for competitive events is found in the Recreation Element. By this amendment, all references to the route approval process contained elsewhere in the Plan are to be interpreted consistent with this revision. It should be clearly understood that both the Recreation Element and this element are subject to, and bound by 43 CFR 8342.1. Compliance to the regulations for competitive events will be demonstrated through environmental assessment documents up to and including, for significant actions, an Environmental Impact Statement ~~for competitive events.~~ For the route approval process, compliance begins with the criteria for route designation decisions (see p. AC-12) and continues throughout the process.

While the Bureau is responsible for vehicle use on public lands, much of the control of vehicle travel in the desert is the responsibility of the user, whether the goal is recreational or commercial. The Bureau of Land Management does not and will not have the funds or staff to oversee vehicle use throughout the desert at all times. Therefore, rules for vehicle use must be fair, understandable, easy to follow, and reasonable if they are to be publicly accepted. Only commitment by the public, the owners of these lands, will insure success of rules and quidelines.

The outline for this element is as follows:

- GOALS
- ACTIONS PLANNED
  - AREA DESIGNATIONS
  - ROUTE DESIGNATIONS
  - STOPPING AND PARKING
  - ACCESS ON WASHES, DUNES AND DRY LAKES
- IMPLEMENTATION
  - PRIORITIES
  - AREA AND ROUTE DESIGNATION PROCESS
  - ON-THE-GROUND IMPLEMENTATION

ON THE GROUND IMPLEMENTATION

INTERIM MANAGEMENT OF VEHICLE ACCESS

REVISIONS

~~VEHICLE-ACCESS-PENDING-IMPLEMENTATION~~

MONITORING

ENFORCEMENT, COMPLIANCE, AND COOPERATION

GOALS

The goal of the Motorized Vehicle Access Element is to provide a system and set of rules governing access to the CDCA by motor vehicles. Specific objectives included are:

1. To avoid or minimize damage or degradation of the natural, cultural, and aesthetic values of the desert.
2. To provide a reasonable network of "routes of travel" which meets the needs of desert users, including commercial users and BLM's "neighbors," the private landowners, and other public-land managing agencies in the CDCA.
3. To reduce to the greatest possible degree conflicts among the desert users.
4. To provide an element that is understandable, easy to folow, acceptable, and supported and encouraged by most desert users.
5. To implement and manage these programs efficiently, economically, and cooperatively.
6. To provide for "appropriate" use of off-road recreational vehicles as directed by FLPMA and in conformance with Executive Orders 11644 and 11989, and 43 CFR 8340.

ACTIONS PLANNED

The goals of the element will be accomplished by establishing rules for managing motorized-vehicle access on public lands, designating areas for appropriate vehicle access, implementing decisions, and establishing a desert-wide monitoring program by the end of fiscal year 1987.

AREA DESIGNATIONS

In accordance with legislation and policy, all public land in the California desert is designated "open," "closed," or "limited" for vehicle use. The area designations are made on the basis of multiple-use classes with certain exceptions as set forth in this element.

Laws, executive orders, policies, and regulations which cover motorized-vehicle use on public lands are described in detail in Appendix VI to the Proposed Plan (October 1980).

Vehicle access designations and their relationship to multiple-use classes are established by the Plan as follows:

Open Area

Vehicle travel is permitted anywhere in the area if the vehicle is operated responsibly in accordance with regulations and subject to permission of private land owners if applicable. This will apply to (1) those lands in Class I specifically designated "open" for vehicle travel, as shown on Map 10; and (2) certain sand dunes and dry lakebeds as listed in Table 8.

Closed Area

No vehicle travel is allowed. This will apply to (1) all wilderness areas when established by Congress unless exempted; (2) land in ACECs...and Special Areas where provided for in management plans; (3) certain sand dunes and dry lakebeds as listed in Table 8, and (4) areas listed in Table 9 which were closed under the Interim Critical Management Plan (ICMP) (1973) and will remain so.

Note: Although the Motorized-Vehicle Access map (Map 10) shows all of Class C as "closed," vehicle access in these areas will be limited as described below until such a time as Congress acts on the wilderness recommendations. They are shown on the map to illustrate what areas would be "closed" to vehicle access if Congress designates these areas as wilderness.

Several areas closed for access under the ICMP are proposed for continued closure or are preliminarily recommended as wilderness or restricted under ACEC Management Plans. Implementation may or may not involve boundary adjustments. To avoid a redesignation process and also to avoid misunderstanding in interpretation of the Plan maps, the areas listed in Table 8, as "closed" under the ICMP, will remain closed under the Plan regardless of underlying class, unless modified by subsequent implementing action.

In addition, the following areas are closed. They have been closed under interim actions, or are closed by virtue of nonwilderness protection items in the Plan, are:

Desert Tortoise Natural Area	L
Darwin Falls	M
Mecca Hills (NW half)	C
Squaw Spring	L

TABLE 8

Areas Designated "Closed" Under ICMP Which Remain Closed Under Desert Plan

ICMP NUMBER	AREA NAME	MULTIPLE USE CLASS
1	Eureka Dunes	C
2	North Saline Valley	C
6a	Owens Peak	C
6b	El Paso Mountain	C
17	Amargosa Canyon	L
22	Clark Mountain	L
24	Kelso Dunes	C
33	Whipple Mountains	C
34	Turtle Mountains	C
43	Desert Lily	L
51	Orocopia Mountains	C
57	San Sebastian Marsh	L
62a	West and SW Areas of Davies Valley (In-Ko-Pa Mountains)	C
63	Crucifixion Thorn	L
64	Area Between Pinto Wash and International Boundary	L
66	Imperial Sand Dunes north of State Route 78	C

Limited Area

"Limited" vehicle access means that motorized vehicle access is allowed only on certain routes of travel, which include roads, ways, trails and washes. At the minimum, use will be restricted to existing routes of travel. An existing route of travel is a route established before approval of the Desert Plan in 1980, with a minimum width of two feet, showing significant surface evidence of prior vehicle use or, for washes, history of prior use. Where necessary, other limitations will be stipulated.

In all areas of limited vehicle use, special attention will be given to identifying conflict areas, zones of route proliferation, and specific sites or resources being damaged by vehicle use. The public will be involved in each step of this process. Appropriate actions will then be taken to reduce or eliminate the problem, depending on the multiple-use class and degree of control needed:

Class I: Unless it is determined that further limitations are necessary, those areas not 'open' will be limited to use of existing routes.

Class M: access will be on existing routes, unless it is determined that use on specific routes must be limited further. ~~Extra controls to be considered are: (1) closing routes on a permanent or seasonal basis, (2) establishing speed limits, or (3) requiring use permits.~~

Class L: Due to higher levels of resource sensitivity in Class L, vehicle access will be directed toward use of approved routes of travel. Approved routes will include primary access routes intended for regular use and for linking desert attractions for the general public as well as secondary access routes intended to meet specific user needs. Routes not approved for vehicle access will be reviewed and, after opportunity for public comment, those routes deemed to conflict with management objectives or to cause unacceptable resource damage will be given priority for closure through obliteration, barricading, or signing. These closures will be enforced to the maximum capability of BLM. All remaining routes of travel will be monitored for either inclusion as approved routes, or for closure to resolve specific problems.

Class C and ACECs: in Class C areas prior to wilderness designation by Congress, and in ACECs where vehicle use is allowed, vehicle access will be managed under the guidelines for Class L.

Undesignated areas: In areas not assigned to a Multiple-Use Class, the route approval process will be applied as needed to resolve specific problems and to establish a cohesive program.

ROUTE DESIGNATIONS

Specific routes in the California Desert will be designated "open," "closed," or "limited" for motor vehicle use. Route designations are generally, but not always, a consequence of area designations.

Vehicle access route designations are established as follows:

Open Route

Access on route by motorized vehicles is allowed. Special uses with potential for resource damage or significant conflict with other use may require specific authorization.

Closed Route

Access on route is prohibited by motorized vehicles except: (1) fire, military, emergency or law enforcement vehicles when used for emergency purposes; (2) combat or combat support vehicles when used for national defense purposes; (3) vehicles whose use is expressly authorized by an agency head under a permit, lease, or contract; and (4) vehicles used for official purposes by employees, agents, or designated representatives of the Federal Government or one of its contractors. Use must be consistent with the multiple use guidelines for that area.

Limited Route

Access on route is limited to use by motor vehicles in one or more of the following ways and limited with respect to:

1) number of vehicles allowed,
2) types of vehicles allowed,
3) time or season of vehicle use,
4) permitted or licensed vehicle use only,
5) establishment of speed limits.

The same exceptions to motor vehicle use of closed routes also apply to limited routes.

Except in Congressionally designated wilderness areas, open, closed, and limited route designations may be made in each of the four multiple use classes, in ACECs, and in unclassified lands.

Table 9

)esignated Vehicle Access for Significant Dry Lakes and Sand Dunes in the CDCA

	Dry Lakes	Class	Motor Vehicle Access
1.	Salt Dry Lake	L	Closed
2.	Mesquite Dry Lake	M	Closed
3.	Ivanpah Dry Lake	L	Closed[1]
4.	Silurian Dry Lake	I	Open
5.	Superior Dry Lake	L** (M)	Closed[1,4]
6.	Harper Dry Lake	L	Closed[1,4]
7.	El Mirage Dry Lake	I	Open
8.	Soggy Dry Lake	I	Open
9.	Melville Dry Lake	I	Open
10.	Means Dry Lake	I	Open
11.	Soda Dry Lake	L	Closed[2,3]
12.	Ford Dry Lake	M	Open
13.	Panamint Dry Lake (south Hwy. 190)	L	Open
14.	Panamint Dry Lake	L	Closed
15.	Silver Dry Lake	L	Closed[2,3]
16.	Coyote Dry Lake	M	Closed[2,3]

* Amendment #5 proposes changes that will be reflected here if amendment is adopted.

**Amendment #20 proposed changes that will be reflected here if amendment is adopted.

Table 9 (Con't)

Sand Dunes	Class	Motor Vehicle Access
1. Eureka Dunes	C	Closed
2. Saline Dunes	L	Closed
3. Panamint Dunes*	C	Closed
4. Dumont Dunes	I	Open
5. Kelso Dunes	C	Closed
6. Cadiz Dunes	L	Closed
7. Imperial/Algodones/Dunes	C	Closed
	L	Open
	I	Open
8. Rice Valley Dunes	M	Open
9. Olancha Dunes	M	Open

[1] Open to non-motorized vehicles access (see Recreation Element).

[2] Except by permit

[3] Except for approved route(s) of travel.

[4] Limited passage of vehicles across area; no motorized vehicle free play.

STOPPING AND PARKING

Stopping and parking and/or vehicular camping along "routes of travel" will be limited to within 100* feet of the route. In some locations, specific parking or stopping areas may be signed "open" or "closed" to protect fragile or sensitive resources adjacent to the route, or to provide a safe place to stop. The intent of this policy is to curtail the uncontrolled widening and/or extension of access routes by vehicles stopping or parking along the route.

ACCESS ON WASHES, SAND DUNES, AND DRY LAKES

Washes

Vehicle access using desert washes will be governed by the area designation for the vicinity in which the wash is located. In areas designated "closed," vehicle access in desert washes will be prohibited. In areas designated "open," vehicle access in desert washes will be permitted. In all "limited" areas, vehicle use in desert washes will be controlled as indicated earlier for routes of travel in Class L, M and I. In addition, washes as access routes may have some type of travel limitation, such as speed limits or seasonal closure, imposed to protect the resources found in or along the wash or to minimize conflicts with other uses.

Sand Dunes and Dry Lakes

Because of the unique geography of these areas, "routes of travel" cannot be readily delineated. Therefore, significant sand dunes and dry lakes within the California desert are designated either "open" or "closed" to vehicular travel regardless of the multiple-use class in which the dune system or dry lake is located. The management objective for each dune system or dry lake will dictate the area's vehicle-use designation. Special monitoring requirements will be needed to protect the resource values in these areas, which are listed in Table 9.

*Amendment #19 proposed to change this to 300'. If the amendment is adopted then this will coincide.

IMPLEMENTATION

PRIORITIES

On-the-ground implementation of vehicle designations will be established, based on the following considerations, in order of priority:

1. Due to the sensitivity of the inventoried resources, highest priority will be given to Multiple-Use Class C (WSA) and L areas and ACECs and Special Areas which are currently experiencing vehicle use inconsistent with the management objectives.

2. Priority will be given to marking the boundaries of those open areas in Class I where high potential for confusion over boundaries exists especially the boundaries of military reservations.

3. Vehicle access limitations will be implemented in Multiple-Use Class M areas which are currently experiencing vehicle use inconsistent with the management objectives.

4. Vehicle-access limitations will be implemented in Multiple-Use Class C and L areas in which there is little intensive vehicle use.

5. Vehicle-access limitations will be implemented in the remainder of Multiple-Use Class M areas and Multiple-Use Class I areas and, where necessary, in unclassified areas.

AREA DESIGNATION PROCESS

Approval of the Plan constitutes the designation of all public lands areas in the CDCA. All "open" and "closed" areas identified on the Motorized-Vehicle Access Element map (Map 10) are designated and appropriate documentation actions are being initiated. "Limited" areas will require detailed analysis to insure that each area's limitations are appropriate to the issues and resources involved. Until such limitations are put into effect, these areas will be managed on an interim basis as explained under 'Interim Management of Vehicle Access.'

ON-THE-GROUND IMPLEMENTATION

The vehicle-management designations "open," "closed," and "limited" are commensurate with the multiple-use class management objectives for each area.

While vehicle-access designations generally follow multiple-use class boundaries, there are several cases where the area's vehicle designation may be either more restrictive or less restrictive than that of the surrounding multiple-use class. Examples include ACECs, Special Areas, sand dunes, and dry lakes. Designated vehicle access, as it generally will be applied, is described below.

Open Areas

Vehicle use in open areas is restricted by the operating regulations and vehicle standards set forth in 43 CFR 8341 and 8343. Open area designations are effective with Plan approval.

ORV-play open areas will be signed and identified on maps for public distribution. In open areas that abut private lands, BLM will provide information which will encourage recreationists to avoid unauthorized use. Signs and brochures will be used, as well as on-site personnel or the placement of permanent kiosks.

Military land boundaries adjacent to motorized play open areas will be signed, and maps will be noted, "Department of Defense Installation, NOT OPEN TO PUBLIC ACCESS." A complete discussion of open areas can be found in the Recreation Element of the Final Plan, and in Appendix V to the Proposed Plan of October, 1980.

Closed Areas

All closed areas will be signed where necessary to prevent unauthorized use, and identified on maps for public distribution.

Limited (Vehicle Use) Areas

Based on implementation priorities, BLM will, with assistance from the public, determine which routes in Class L and M areas need to be closed or limited in some other way. Route approval will be based on these considerations:[1]

1. Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.

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[1] From 43 CFR 8342.1 (1981)

2. Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.

3. Areas and trails shall be located to minimize conflicts between offroad vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

4. Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established.

Routes not approved for vehicle access would in most instances be obliterated, barricaded, signed, or otherwise marked. Wherever possible, natural and/or physical barriers would be used to close routes rather than a multitude of signs.

Multiple-Use Class C

All public lands in Multiple-Use Class C are recommended as suitable for wilderness (see Wilderness Element). Congressionally designated wilderness areas are, by law closed to motorized-vehicle. Accordingly, as Congress acts and designates these or any other areas as wilderness, the public lands will be designated "closed" to vehicle use unless exempted. On-the-ground implementation will involve boundary signing and maps.

Vehicle use on lands preliminarily recommended as suitable for wilderness, but not yet designated by Congress as wilderness, will be managed under guidelines described for Multiple-Use Class L (see Wilderness Element and Interim Management Policy for WSAs). Limitations on vehicle access are necessary to protect wilderness values as well as other significant resources. Any vehicle access routes within the suitable WSA will be analysed in management plan preparations.

Maps

In Multiple-Use Class I areas not open to vehicle play, Class M and L areas, and proposed Class C areas, the existing route network will be recorded on 7 1/2 or 15 minute USGS maps. The inventory will make use of aerial photos, State and Federal agency maps, and other sources. As many routes will be identified as practical. These maps will then be used to monitor vehicle use impacts and to produce maps for public use.

Once the inventory is reasonably complete,primary access route will be designated by each Area Office. These routes, ~~including some washes,~~ will be those upon which the BLM (with public input) wishes to encourage use. Selected routes will be signed on-the-ground with numbers or names that will also be on BLM produced maps which will be made available to the public.

Maps are management tools as well as aids to vehicle users. General access maps in the future will show the primary access network ~~and other selected routes~~ whose use causes few if any problems. It is likely that some open routes will not be shown if such "advertisement" would cause user or resource conflict due to heavier use. As a matter of policy, closed routes will be shown only as a short spur to mark the intersection with approved routes Detailed maps (USGS Maps) showing secondary access routes will be made available for a fee.

Signs

Signs are also important management tools, which are necessary because many desert users will not have BLM maps. Any decisions to limit use of a road or area must be reflected in on-the-ground signs. Designated areas and their approved routes, open and closed area boundaries, and the primary access network will receive priority in the signing program. Signs will be designed and placed only where necessary, to minimize visual impact.

INTERIM MANAGEMENT OF VEHICLE ACCESS

Since 1973, BLM has managed access and recreation and recreation-vehicle use under the Interim Critical Management Program (ICMP). An integral part of that program was the release of a series of 22 maps covering the entire CDCA. These maps illustrate the ICMP designations through the use of a color code and a network of access routes compiled from existing maps, public input, and field review. These maps show access in far greater detail than the small-scale desert-wide map issued at the same time which simply showed designations.

With approval of the Desert Plan, the new designations have become effective. There are, however, major changes in designations from the ICMP. The ICMP maps and designations will no longer apply. Until implementation of this element is complete, the following guidelines are in effect:

Existing routes of travel may be used in all Class L and M areas, and in those Class I areas not designated open and in unclassified lands, unless other limitations are in effect. Tables 8 and 9 list all closed areas. In some areas, certain routes have been closed under ICMP guidelines -- these will remain closed. As implementation proceeds, some old limitations may be revoked and others added; the public will be notified as changes are proposed.

In Class C areas, vehicle use will occur as if the areas were Class L until such time as the area formally becomes wilderness, except in those cases where vehicle use could impair wilderness suitability.

In wilderness study areas ~~not recommended as suitable~~, vehicle use will be managed according to the guidelines for the class that area has been assigned, or according to the guidelines set forth in the WSA Interim Management Policy, whichever is more restrictive.

REVISIONS

Decisions affecting vehicle access, such as area designations and specific route limitations, are intended to meet present access needs and protect sensitive resources. Future access needs or protection requirements may require changes in these designations or limitations, or the construction of new routes. For mining operations, additional access needs will be considered in accordance with the Bureau's Exploration and Mining - Wilderness Review Program regulations (43 CFR 3802) and Surface Management of Public Lands Under the U.S. Mining Laws (43CFR 3809). Access needs for other uses, such as roads to private lands, grazing developments, competitive events, or communication sites, would be reviewed on an individual basis under the authority outlined in Title V of FLPMA and other appropriate regulations. Each proposal would be evaluated for environmental effects and subjected to public review and comment. As present access needs become obsolete or as considerable adverse impacts are identified through the monitoring program, area designations or route limitations will be revised. In all instances, new routes for permanent or temporary use would be selected to minimize resource damage and use conflicts, in keeping with the criteria of 43 CFR 8342.1.

MONITORING

A major component of the vehicle-access element is the monitoring of impacts resulting from vehicle use. The analysis of impacts and reassessment of management decisions is an integral part of the Bureau's response to the legislative mandate.

The primary objectives of the motorized-vehicle access monitoring program are to:

1. Identify and document when unacceptable levels and kinds of impacts occur on natural, cultural, and historic values.
2. Identify when impacts will preclude corrective or rehabilitative actions.

3. Identify the type of vehicle equipment and/or related use which is causing, or likely to cause, impacts.
4. Provide the information necessary to make immediate and long-range decisions on the use or prohibition of vehicles on designated or existing access routes.

Recommendations of monitoring efforts must be specific to each individual area, taking into consideration such issues as access needs, use levels, user conflicts, and impacts on resources. Monitoring efforts may vary. Monitoring techniques include field observations, remote sensing, ground photographs, and environmental study plots.

Options to limit, designate, or close specific travel routes or areas will be available to the manager. These options will be invoked when monitoring reveals that Plan objectives are not being met because of identified adverse effects resulting from vehicle travel.

ENFORCEMENT, COMPLIANCE, AND COOPERATION

Enforcement of these vehicle designations would rely heavily on indirect, cooperative actions, such as voluntary compliance, peer pressure, public information brochures and maps, educational/awareness programs, and access route signing.

Access and area designation planning would be done in close coordination with desert users so that all legitimate access needs can be incorporated into the designation. In sensitive areas or where these compliance methods are not successful, other methods would be employed. These methods include emergency closures, special access permits, issuance of right-of-way easements, or further restriction of the route(s) in question to provide additional use limitations (season of use, limitations on the number or types of vehicles permitted, speed limits, etc.). Direct law enforcement, either by contractual agreement with local law enforcement agencies, or by Bureau Desert Rangers and/or visitor services specialists, would be a last-resort option.

Volunteers will be actively sought to help implement the program. Route designation tasks in these projects would include sign placement, obliteration of closed routes, and identification of access needs.

GPO 688-603/141

Form 1279–3
(June 1984)

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